

TSD File Inventory Index

Date: October 25, 2001

Initial: CMK/ewar

Facility Name: <u>Nettle Point Graphic Service Division (the Tolder Site)</u>			
Facility Identification Number: <u>OHD 055 827 489</u>			
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Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule.*

A.2 Part A/
Interim Status



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mark Tucker, Safety Engineer
Technicare Corporation
29100 Aurora Road
Solon, Ohio 44139

RE: Interim Status Acknowledgement
FACILITY NAME: Technicare Corporation

USEPA ID No. OHD055827489

Dear Mr. Tucker:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

DS
8/10/92

Enclosure

EPA ID NUMBER

OHD055827489

Technicare Corporation

Technicare Corporation

FACILITY LOCATION

29100 Aurora Road.
Solon, Ohio 44139

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

S01

20,435

G

KEY

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G or L	GALLONS	G
TANK	S02	G or L	LITERS	L
WASTE PILE	S03	Y or C	CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G or L	CUBIC METERS	C
DISPOSAL:			GALLONS PER DAY	U
			LITERS PER DAY	V
			TONS PER HOUR	D
			METRIC TONS/HOUR	W
INJECTION WELL	D79	G, L, U, or V	GALLONS/HOUR	E
LANDFILL	D80	A or F	LITERS/HOUR	H
LAND APPLICATION	D81	B or Q	ACRE-FEET	A
OCEAN DISPOSAL	D82	U or V	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G or L	ACRES	B
TREATMENT:			HECTARES	Q
			POUNDS/HOUR	J
TANK	T01	U or V	KILOGRAMS/HOUR	R
SURFACE IMPOUNDMENT	T02	U or V	TONS PER DAY	N
INCINERATOR	T03	D, W, E, or H	METRIC TONS/DAY	S
OTHER	T04	U, V, J, R, N, or S		



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHD055827489

REACKNOWLEDGEMENT

TECHNICARE CORPORATION
29100 AURORA ROAD
CLEVELAND

OH 44139

INSTALLATION ADDRESS

29100 AURORA ROAD
CLEVELAND

OH 44139

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

Deleted FOI 7
Changed Contact 4-29-82
Map

PLEASE PLACE LABEL IN THIS SPACE

RECEIVED
APR 20 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

FOR OFFICIAL USE ONLY

COMMENTS

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00
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INSTALLATION'S EPA I.D. NUMBER													APPROVED				DATE RECEIVED (yr., mo., & day)				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
F 04 D 055 827489													T/A C 1								

I. NAME OF INSTALLATION

TECHNICARE CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

329100 AURORA ROAD

CITY OR TOWN

SOLON OH 44139

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5

CITY OR TOWN

6

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

TUCKER MARK SAFETY ENGINEER 216-248-1800

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

JOHNSON & JOHNSON

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☐ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

04D055827489

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY														
S													T/A	C
W														1
1	2												13	14

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 F 0 0 3 23 - 26	3 F 0 0 4 23 - 26	4 F 0 0 5 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 6 9 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)


☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) ROBERT E. BAKER Vice President Operations	DATE SIGNED 4/15/82
--	--	------------------------



001656

INSTALLATION'S EPA I.D. NO.	OHD055827489
NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	TECHNICARE CORPORATION 29100 AURORA ROAD CLEVELAND, OH 44139
III. LOCATION OF INSTALLATION	29100 AURORA ROAD CLEVELAND, OH 44139

COMMENTS

C															C																			
15															16																			
INSTALLATION'S EPA I.D. NUMBER															APPROVED										DATE RECEIVED (yr., mo., & day)									
S F 0H00558274893															T/A C A										800818									
1 2															13 14 15										16 17 18 19 20 21 22									

TECHNICARE CORPORATION

STREET OR P.O. BOX

[illegible]

STREET OR ROUTE NUMBER

5		S A M E															45											
15		CITY OR TOWN															ST.		ZIP CODE									
6		S A M E															40		41		42		43		44		45	

NAME AND TITLE (last, first, & job title)

2	F	U	M	I	C	H	A	L	B	E	R	T	M	G	R	F	A	C	I	L	I	T	I	E	S	2	1	6	2	4	8	1	8	0	0
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A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL M = NON-FEDERAL	M	<input checked="" type="checkbox"/> 57 A. GENERATION	<input type="checkbox"/> 58 B. TRANSPORTATION (complete item VII)
		<input checked="" type="checkbox"/> 59 C. TREAT/STORE/DISPOSE	<input type="checkbox"/> 60 D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter “X” in the appropriate box(es))

☐ 41 A. AIR ☐ 42 B. RAIL ☐ 43 C. HIGHWAY ☐ 44 D. WATER ☐ 45 E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION ☐ B. SUBSEQUENT NOTIFICATION (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26 7 23 - 26	2 F 0 0 3 23 - 26 0 23 - 26	3 F 0 0 4 23 - 26 9 23 - 26	4 F 0 0 5 23 - 26 10 23 - 26	5 F 0 1 7 23 - 26 11 23 - 26	6 23 - 26 12 23 - 26
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B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 6 9 23 - 26 19 23 - 26 25 23 - 26	14 23 - 26 20 23 - 26 26 23 - 26	15 23 - 26 21 23 - 26 27 23 - 26	16 23 - 26 22 23 - 26 28 23 - 26	17 23 - 26 23 23 - 26 29 23 - 26	18 23 - 26 24 23 - 26 30 23 - 26
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C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26 37 23 - 26 43 23 - 26	32 23 - 26 38 23 - 26 44 23 - 26	33 23 - 26 39 23 - 26 45 23 - 26	34 23 - 26 40 23 - 26 46 23 - 26	35 23 - 26 41 23 - 26 47 23 - 26	36 23 - 26 42 23 - 26 48 23 - 26
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D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Mont Staffels

NAME & OFFICIAL TITLE (type or print)

Director of Manufacturing

DATE SIGNED

8/13/80

FORM 1 GENERAL	 U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <small>(Read the "General Instructions" before starting.)</small>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> F O H D 0 5 5 8 2 7 4 8 9 </div>
LABEL ITEMS <div style="border: 1px solid black; padding: 5px;"> EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION </div>		GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP **TECHNICARE CORPORATION**

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 TUCKER, MARK, SAFETY ENGINEER	216 248 1800

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 29100 AURORA ROAD	SOLON	OH	44139

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	CUYAHOGA				035

RECEIVED
 4/26/82

VIII. OPERATOR INFORMATION

F. CITY OR TOWN													G. STATE		H. ZIP CODE		IX. INDIAN LAND	
S O L O N													O H		4 4 1 3 9		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
13	16							40	41	42	47	51						
															52			

X. EXISTING ENVIRONMENTAL PERMITS																								
A. NPDES (Discharges to Surface Water)									D. PSD (Air Emissions from Proposed Sources)															
C	T	I							C	T	I													
9	N								9	P		E	P	A	1	3	1	8	5	3	4	4	1	8
15	16	17	18	-	-	-	-	30	15	16	17	18	-	-	-	-	30							
B. UIC (Underground Injection of Fluids)									E. OTHER (specify)															
C	T	I							C	T	I													
9	U								9									(specify)						
15	16	17	18	-	-	-	-	30	15	16	17	18	-	-	-	-	30							
C. RCRA (Hazardous Wastes)									E. OTHER (specify)															
C	T	I							C	T	I													
9	R								9									(specify)						
15	16	17	18	-	-	-	-	30	15	16	17	18	-	-	-	-	30							

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURER OF MEDICAL DIAGNOSTIC IMAGING EQUIPMENT

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

COMMENTS FOR OFFICIAL USE ONLY	
C	
15	16

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER														
			S F 0 H D 0 5 5 8 2 7 4 8 9 T/A C 1														
			1 2 13 14 15														

FOR OFFICIAL USE ONLY														
APPLICATION APPROVED					DATE RECEIVED (yr., mo., & day)					COMMENTS				
23					24					29				

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A C 1														
1 2 13 14 15														
LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)						
X-1	S 0 2	600	G		5									
X-2	T 0 3	20	E		6									
1	S 0 1	8,315	G		7									
	S 0 1	60	Y		8									
3					9									
4					10									
16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32														

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">S</div> <div style="border: 1px solid black; padding: 2px;">W</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">T/A</div> <div style="border: 1px solid black; padding: 2px;">C</div> </div> </div>															<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">S</div> <div style="border: 1px solid black; padding: 2px;">W</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">T/A</div> <div style="border: 1px solid black; padding: 2px;">C</div> </div> </div>									
<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">2</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">13</div> <div style="border: 1px solid black; padding: 2px;">14</div> <div style="border: 1px solid black; padding: 2px;">15</div> </div> </div>															<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">2</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">13</div> <div style="border: 1px solid black; padding: 2px;">14</div> <div style="border: 1px solid black; padding: 2px;">15</div> </div> </div>									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
				27	28	29	27	28	29	27	28	29	27	28	29
1	F 0 0 1	15	T	S	0	1									
2	F 0 0 3	850	P	S	0	1									
3	F 0 0 4	4	T	S	0	1									
4	F 0 0 5	120	P	S	0	1									
5	K 0 6 9	1500	P	S	0	1									
6	P 0 1 5	25	P	S	0	1									
7	D 0 0 1	28	T	S	0	1									
8	D 0 0 2	4	T	S	0	1									
9															
10															
11															
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21															
22															
23															
24															
25															
26															

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	0	H	D	0	5	5	8	2	7	4	8	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

8	1	2	8	0	0	0
55	56	57	58	59	60	61

LONGITUDE (degrees, minutes, & seconds)

0	4	1	2	4	0	0	0
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER
☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX												4. CITY OR TOWN												5. ST.				6. ZIP CODE																																			
<table border="1"> <tr> <td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td> </tr> </table>												13	14	15	16	17	18	19	20	21	22	23	24	<table border="1"> <tr> <td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td>31</td><td>32</td><td>33</td><td>34</td><td>35</td><td>36</td> </tr> </table>												25	26	27	28	29	30	31	32	33	34	35	36	<table border="1"> <tr> <td>37</td><td>38</td><td>39</td><td>40</td> </tr> </table>				37	38	39	40	<table border="1"> <tr> <td>41</td><td>42</td><td>43</td><td>44</td> </tr> </table>				41	42	43	44
13	14	15	16	17	18	19	20	21	22	23	24																																																				
25	26	27	28	29	30	31	32	33	34	35	36																																																				
37	38	39	40																																																												
41	42	43	44																																																												

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

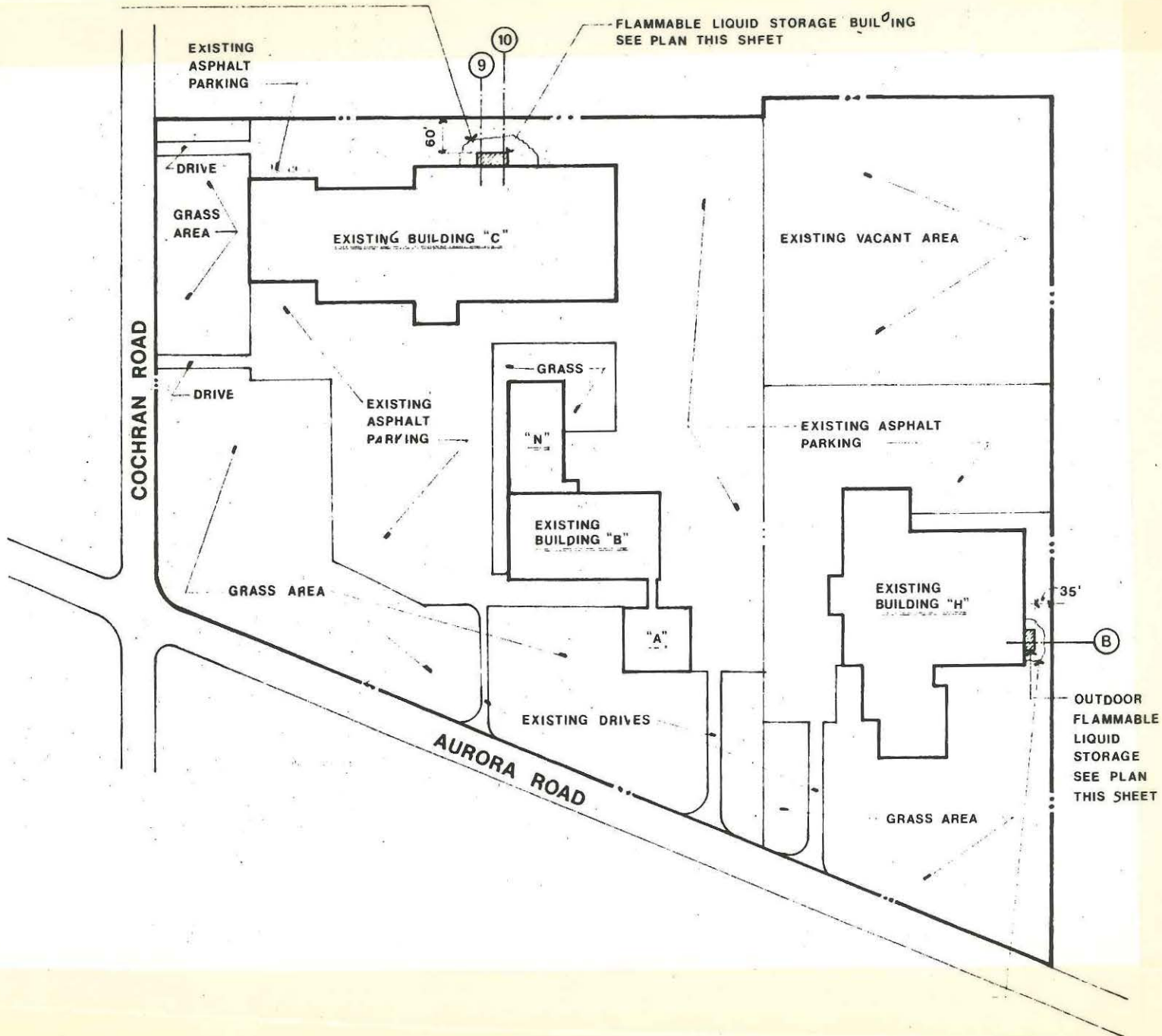
B. SIGNATURE

C. DATE SIGNED

ROBERT E. BAKER



4/16/82



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FORM 1 GENERAL	 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> 040055827489 </div>
LABEL ITEMS EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>	
III. FACILITY NAME TECHNICARE CORPORATION 29100 AURORA ROAD CLEVELAND, OH 44139		VI. FACILITY LOCATION 29100 AURORA ROAD CLEVELAND, OH 44139	

II. POLLUTANT CHARACTERISTICS			
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.			
SPECIFIC QUESTIONS	MARK 'X'		SPECIFIC QUESTIONS
	YES	NO	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)

III. NAME OF FACILITY	
C	1 SKIP

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 FUMICH ALBERT MGR FACILITIES	216 248 1800

V. FACILITY MAILING ADDRESS			
A. STREET OR P.O. BOX			
3			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4			

VI. FACILITY LOCATION			
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5			
B. COUNTY NAME			
CUYAHOGA			
C. CITY OR TOWN		D. STATE	E. ZIP CODE
6			
		F. COUNTY CODE (if known)	
		035	

VIII. OPERATOR INFORMATION

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

D. PHONE (area code & no.)E. STREET OR P.O. BOXF. CITY OR TOWNG.STATEH. ZIP CODEIX. INDIAN LAND OH

4 4 1 3 9

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

C	T	I
9	P	E P A l 3 l 8 5 3 4 4 l 8

B. UIC (Underground Injection of Fluids)

E. OTHER (specify)

C	T	I
9		
15	16	17

C. RCRA (Hazardous Wastes)

E. OTHER (specify) _____

C	T	I
9		

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9 A/50

XII. NATURE OF BUSINESS *(provide a brief description)*

Manufacturer of Medical Diagnostic Imaging Equipment.

F9 $\frac{A}{51}$

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

COMMENTS FOR OFFICIAL USE ONLY

[illegible]

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"); FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Neutralization of conversion coating tanks prior to disposal into the city sewer system. Our plant flow is 22,500 gallons per day.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

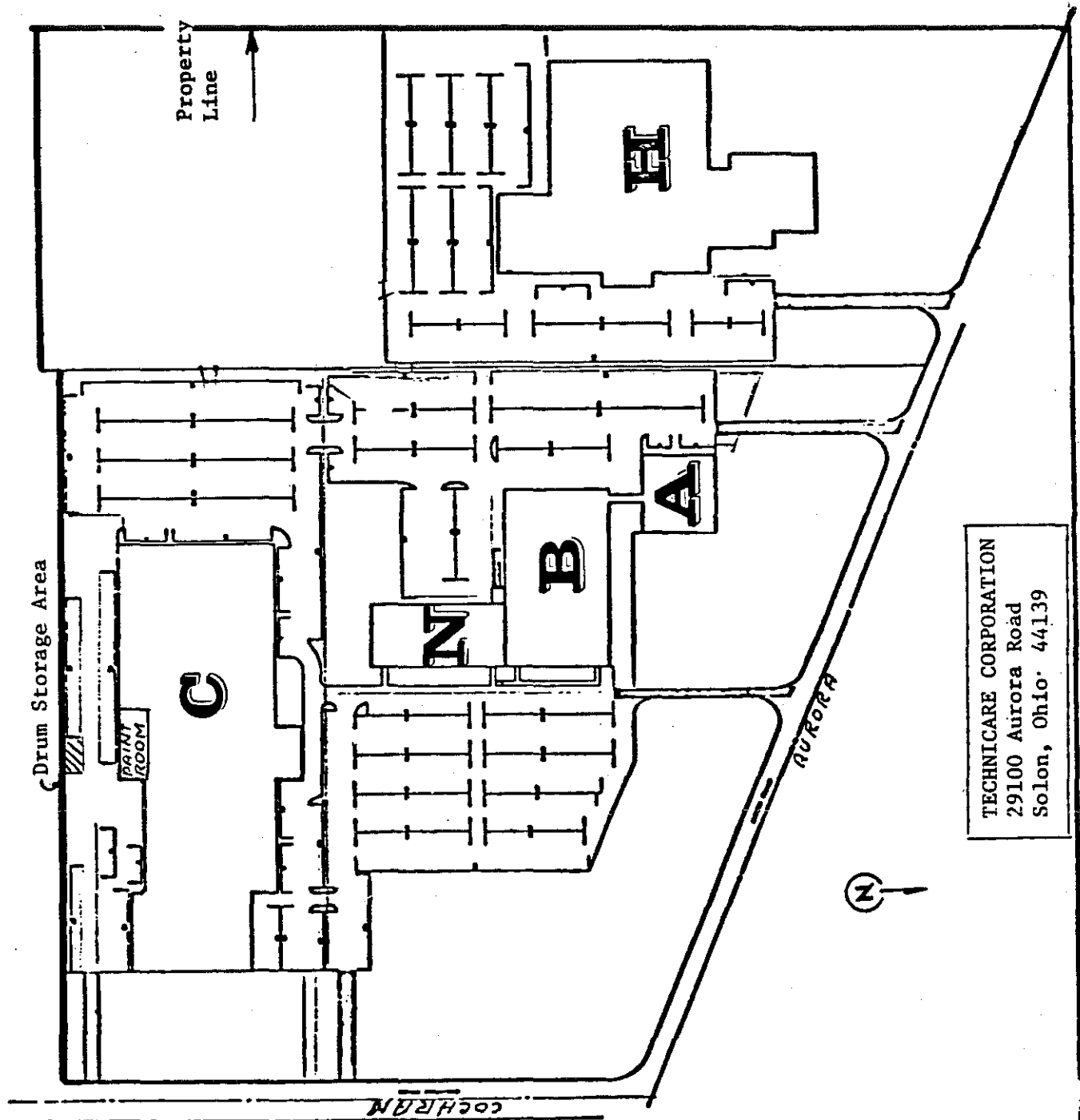
NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. J-Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

V. FACILITY DRAWING (see page 4)



EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																			
W O H D 0 5 5 8 2 7 4 8 9 3 1													W DUP																			
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES																			
W O H D Z	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
	23	24	25	26	27	28	29	30		31	32	33	34	35	36	37	38	39	40	41	42		43	44	45	46	47	48	49	50		
1	F	0	0	1	15	000			T	S	0	1																				
2	F	0	0	3	850	000			P	S	0	1																				
3	F	0	0	4	4	000			T	S	0	1																				
4	F	0	0	5	120	000			P	S	0	1																				
5	F	0	1	7	14	000			T	S	0	1																				
6	K	0	6	9	1500	000			P	S	0	1																				
7	P	0	1	5	25	000			P	S	0	1																				
8	D	0	0	1	3	000			T	S	0	1																				
9	D	0	0	2	4	000			T	S	0	1																				
10	D	0	0	2	102	000			T	T	0	4																				
11																																
12																																
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26																																

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	5	5	8	2	7	4	8	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWINGAll existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). *FL 11/55***VI. PHOTOGRAPHS**All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). *FL 11/56***VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, & seconds)

8	1	2	8	0	0	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

0	4	1	2	4	0	0	0
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER**XXA.** If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.**B.** If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	TECHNICARE CORPORATION
15	16	

2	1	6	2	4	8	1	8	0	0
55	56	57	58	59	60	61	62	63	64

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	29100 Aurora Road
15	16	

C	G	Solon,
45	46	

O	H
40	41

4	4	1	3	9
47	48	49	50	51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Albert Fumich

B. SIGNATURE

Albert Fumich

C. DATE SIGNED

11-7-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Vince Staffileno

B. SIGNATURE

Vincent R. Staffileno

C. DATE SIGNED

11/8/80

7 AUG 1987

5HS-13

Thomas Copeland
Manager of Facilities
The Technicare Corporation
29100 Aurora Road
Solon, Ohio 44139

RE: Closure Plan
Technicare Corporation
OHD 055 827 489

Dear Mr. Copeland:

The United States Environmental Protection Agency (U.S. EPA) received a copy of the above-referenced facility's closure plan on March 20, 1987. This plan was submitted to the Ohio Environmental Protection Agency (OEPA) on March 11, 1987. The plan concerned the closure of a hazardous waste outside drum storage area, an underground storage tank and an explosion proof addition area located at the facility.

The OEPA approved the plan conditionally, in a letter, dated June 29, 1987. The U.S. EPA concurs with OEPA's review and approval. U.S. EPA approves the closure plan submitted by Technicare Corporation with the conditions stipulated by OEPA in the June 29, 1987, letter.

If you have any further questions, please contact Ms. Rebecca Strom of my staff, at (312) 886-6194.

Sincerely,

ORIGINAL SIGNED BY/
KARL E. BREMER

Karl E. Bremer, Chief
Technical Programs Section

cc: Dan Fisher, OEPA
Mark Bergman, OEPA-NEDO
Tom Crepeau, OEPA

bcc: File

5HS/Strom:vm

8/4/87

Disk #2

cu 8687

INIT. DATE	TYP.	AUTH.	II. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	SWB CHIEF	WMD DIR
8-5-87							DA 8/16/87	KEP 8/7/87		

architectural engineering
services
civil engineering
services
professional engineers
registered in ohio

CUYAHOGA ENGINEERING SERVICES

July 9, 1987

Mr. George Hamper, Chief
Waste Management Division
Technical Programs Section
Ohio Unit, USEPA, Region V, SHS-13
230 South Dearborne Street
Chicago, Ill. 60604

Subject: Technicare Corporation Closure Plan

Dear George,

On March 10, 1987 we submitted to USEPA, Region V a copy of the Technicare Corporation Hazard Waste Facility Closure Plan for your review.

Find enclosed a copy of our addendum No. 1, dated July 9, 1987 which amends the Closure Plan. The addendum was generated from the comments of Ohio EPA (see attached letter from Ohio EPA, Steven J. Grossman, Acting Director to Mr. Thomas Copeland, Manager of Facilities, Technicare Corporation, dated June 29, 1987).

The Closure Plant including addendum No. 1 has been approved by Ohio EPA and the Operations of the Closure is ready to commence (see attached letter from Ohio EPA as noted in above paragraph).

Since Ohio EPA is not authorized to conduct the Federal Waste Program in Ohio, concurrent approval is required by your office in order that the operation of the plan can commence.

Would you kindly review the Closure Plan documents and submit your comments and recommendations in order that we can obtain your required approval of the Plan.

Cuyahoga Consulting Services is acting as Technicare's Registered Engineer and behalf and if you need further information, please contact us at your convenience.

Sincerely,

CUYAHOGA CONSULTING SERVICES

A handwritten signature in cursive script, appearing to read "Carl P. Gulla, Jr.", with a stylized flourish at the end.

Carl P. Gulla, Jr. P.E.

Tec1.1et

cc: Tom Copeland - Technicare Corp.
Mark Bergman - Ohio EPA

Technicare Closure Plan

Addendum No. 1

Date: July 9, 1987

The Technicare corporation

Hazardous Waste Facility Closure Plan

The addendum modifies as stipulated and noted below the above mentioned Waste Facility Closure Plan and is inclusive of the intention of the work or changes it describes.

Article I Respirators

Page 7 - Closure Operations - Scope of the Work
Item A.40

Workers involved in high pressure stream cleaning of hazardous waste management areas shall wear respirators with appropriate cartridges, not nose masks as described previously in the closure plan.

Article II Rinseate Samples

Page 7, 8 - Closure Operations - Scope of Work
Item A.50 & A.60

Page 11 - Closure Operations - Decontamination of Exterior
Item #.20
and all other applicable items

Rinseate samples from the explosion proof addition and the exterior empty drum storage area shall be analyzed for the compounds and elements described in Exhibit Eight of the closure plan. Rinseate samples shall also be analyzed for EP Toxicity metals (40 CFR 261.24) using methods found in ESEPA Publication SE-846 "Methods for Evaluating Solid Wastes." The sampled surfaces and the Rinseate shall be considered contaminated if chlorinated solvents are found at greater than 1mg/l or if any of the other hazardous waste organic compounds analyzed for are found at greater than the compounds' analytical detection limit. The sampled surfaces and Rinseate shall also be considered contaminated if EP Toxicity metals are present at greater than the maximum concentrations found in 40 CFR 261.24 and OAC 3745-51-24. Cleaning of the areas shall continue until these criteria are satisfied. Contaminated rinseates shall be managed as hazardous waste.

Article III Soil Samples

Page 8 - Closure Operations - Removal of Underground Tank
Section B.10

Refer to sub items 2> and 3> of the Closure Plan

Soil samples shall be collected at four locations around the underground storage tank. Samples shall be taken at six (6) inches and at the depth of the bottom of the tank at each location. The soil samples shall be analyzed for the compounds and metals described in Exhibit Eight of the closure plan. All metals analyses shall be for total metals.

Refer to sub items 4> of the Closure Plan

Background levels of naturally occurring elements shall be determined by collecting four (4) background samples from areas noted and described by the attached sketch.

Technicare shall select from the attached a means by which background and closure soil samples shall be compared to determine if soils around the underground storage tank are significantly contaminated with naturally occurring elements as a result of waste management activities.

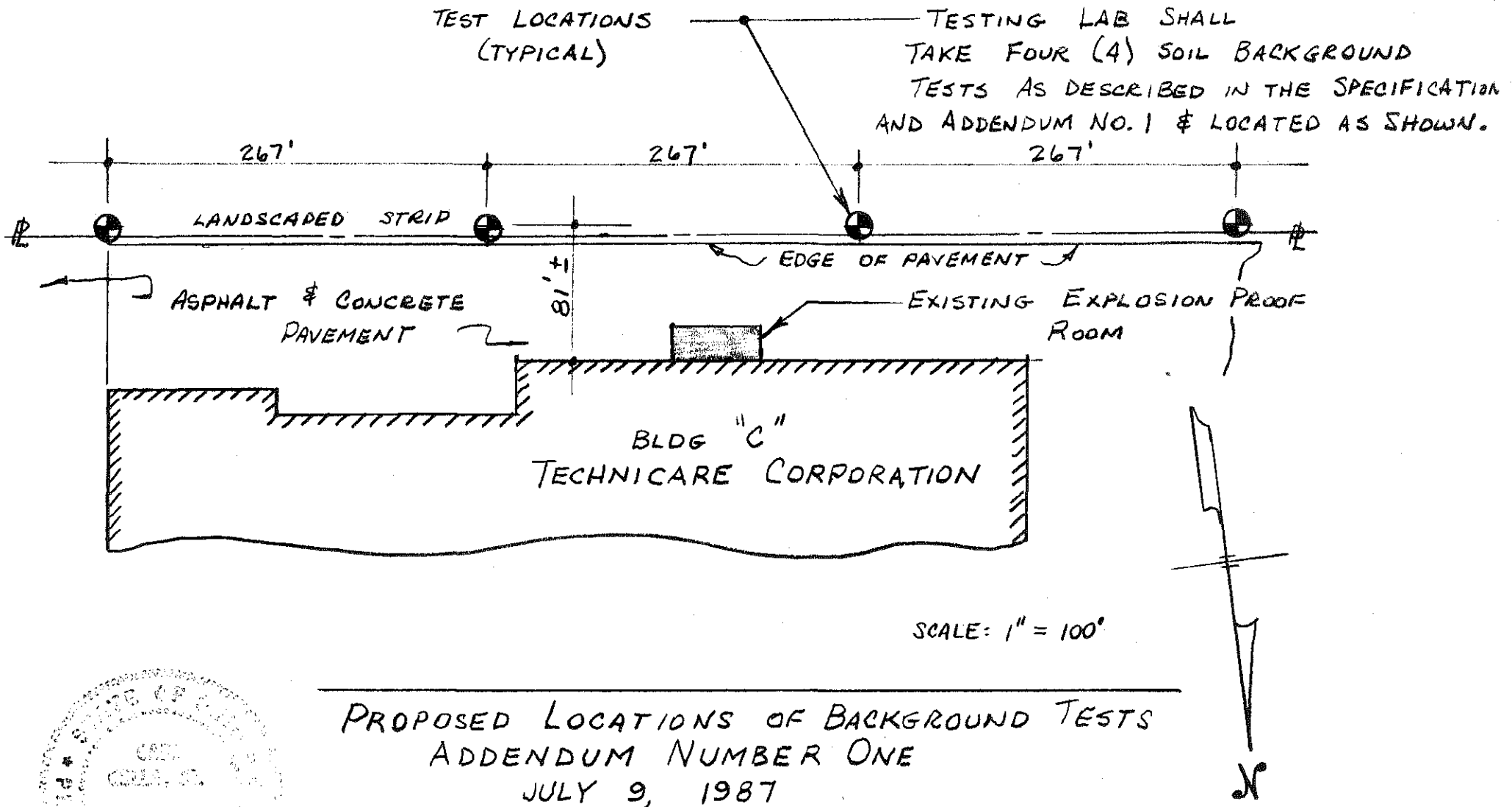
Soil determined to be contaminated by the method referenced above shall be managed as hazardous waste. Soil containing any RCRA-regulated organic compound at levels greater than the compound's analytical detection limit shall be considered contaminated. All contaminated soil shall be managed as hazardous waste.

"Background levels" of organic compounds shall not be used in determining "clean levels" during closure as previously stated in the closure plan.

Locations of background samples are described by the attached sketch.

PREPARED BY:

CUYAHOGA CONSULTING SERVICES





State of Ohio Environmental Protection Agency

P.O. Box 1049, 361 E. Broad Street
Columbus, Ohio 43266-1049
(614) 466-8565

Richard F. Celeste
Governor

CERTIFIED MAIL

June 29, 1987

Re: CLOSURE PLAN
TECHNICARE CORPORATION
OHD055827489/02-18-0223

Mr. Thomas Copeland
Manager of Facilities
The Technicare Corporation
29100 Aurora Road
Solon, Ohio 44139

RECEIVED

JUN 01 1987

SOLID WASTE DIVISION
U.S. EPA, REGION V

Dear Mr. Copeland:

On March 11, 1987, the Technicare Corporation submitted to Ohio EPA a closure plan for three hazardous waste management units located at 29100 Aurora Road, Solon, Ohio. These units are referred to as the "explosion proof addition," the "outside drum storage area" and the "underground storage tank." The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Technicare Corporation's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of the Technicare Corporation in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at the Technicare Corporation meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by the Technicare Corporation is hereby approved with the following conditions:

1. Workers involved in high pressure steam cleaning of hazardous waste management areas shall wear respirators with appropriate cartridges, not nose masks as described in the closure plan.
2. Rinseate samples from the explosion proof addition and the exterior empty drum storage area shall be analyzed for the compounds and elements described in Exhibit Eight of the closure plan. Rinseate samples shall also be analyzed for EP Toxicity metals (40 CFR 261.24) using methods found in USEPA Publication SW-846 "Methods for Evaluating Solid Wastes." The sampled surfaces and the rinseate shall be considered contaminated if chlorinated solvents are found at greater than 1 mg/l or if any of the

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By: Mary Cavan Date 6-29-87

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUN 29 1987

Mr. Thomas Copeland
Page Two
June 29, 1987

other hazardous waste organic compounds analyzed for are found at greater than the compounds' analytical detection limit. The sampled surfaces and rinseate shall also be considered contaminated if EP Toxicity metals are present at greater than the maximum concentrations found in 40 CFR 261.24 and DAC 3745-51-24. Cleaning of the areas shall continue until these criteria are satisfied. Contaminated rinseates shall be managed as hazardous waste.

3. Soil samples shall be collected at four locations around the underground storage tank. Samples shall be taken at six (6) inches and at the depth of the bottom of the tank at each location. The soil samples shall be analyzed for the compounds and metals described in Exhibit Eight of the closure plan. All metals analyses shall be for total metals.
4. Background levels of naturally occurring elements shall be determined by collecting at least four (4) background samples from areas at the facility unaffected by waste management activities. The samples shall be taken in soil types similar to those sampled around the underground storage tank. The location of the background samples shall be submitted to the Ohio EPA Northeast District Office and Central Office within ten (10) working days of the date of this letter.
5. Technicare shall select from the attached a means by which background and closure soil samples shall be compared to determine if soils around the underground storage tank are significantly contaminated with naturally occurring elements as a result of waste management activities.
6. Soil determined to be contaminated by the method referenced in Condition 5 shall be managed as hazardous waste. Soil containing any RCRA-regulated organic compound at levels greater than the compound's analytical detection limit shall be considered contaminated. All contaminated soil shall be managed as hazardous waste.
7. "Background levels" of organic compounds shall not be used in determining "clean levels" during closure as stated in the closure plan.

Please be advised that approval of this closure plan does not release the Technicare Corporation from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed and approved by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to George Hamper, Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois. Ohio Environmental Protection Agency approval of the closure plan is necessary prior to commencement of activities required by the approved closure plan.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

JUN 29 1987

By: Mary Cameron Date 6-29-87

Mr. Thomas Copeland

Page Three

June 29, 1987

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator should include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-1049.

Sincerely,



Steven J. Grossman
Acting Director

DF/ara

cc: Thomas Crepeau/DSHWM Central File, Ohio EPA
Rebecca Strom, USEPA, Region V
Mark Bergman, Ohio EPA, NEDO
Carl P. Gulla, Jr., P.E.

1370U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Caven Date 6-29-87

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUN 29 1987

ATTACHMENT

Naturally Occurring Elements or Compounds:

Alternative A - Soils containing naturally occurring elements in the area of the hazardous waste management unit shall be considered to be contaminated if concentrations in the soils exceed the mean of the background samples plus two standard deviations.

All metals analyses must be for total metals.

Alternative B - Soils containing RCRA-regulated metals shall be considered to be contaminated if concentrations in the soil exceed the upper limit of the range for Ohio farm soils, as given below:

<u>Metal</u>	<u>Range (Total Metal Concentration in ug/g)</u>
Cadmium	0 - 2.9
Chromium	4 - 23
Lead	9 - 39

(Source: Logan, T.J. and R.H. Miller, 1983. Background Levels of Heavy Metals in Ohio Farm Soils. Research Circular 275, Ohio State University, Ohio Agricultural Research and Development Center, Wooster.)

All metals analyses must be for total metals.

Ohio EPA may reject any of the above alternatives based on site-specific information. Also, the Agency may accept alternate statistical methods if the owner/operator can demonstrate that the statistical method proposed is environmentally acceptable and is technically superior.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 6.29-87

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUN 29 1987



State of Ohio Environmental Protection Agency

P.O. Box 1049, 361 E. Broad Street
Columbus, Ohio 43266-1049
(614) 466-8565

Richard F. Celeste
Governor

March 18, 1987

RECEIVED

MAR 20 1987

U.S. EPA REGION V

Technicare Corporation
Attn: Tom Copeland
29100 Aurora Road
Solon, Ohio 44139

Re: Technicare Corporation
US EPA ID No.: OHD055827489
Ohio Permit No.: 02-18-0223
Closure Plan

RECEIVED
MAR 20 1987
U.S. EPA REGION V

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Technicare Corporation in Solon, Ohio will appear the week of March 22, 1987, in the Plain Dealer, Cleveland, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, April 24, 1987.

Copies of the closure plan will be available for public review at the Cleveland Public Library, 325 Superior Avenue, Cleveland, Ohio 44114 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Please contact me at (614) 466-1578, if you have any questions concerning this matter.

Sincerely,

James F. Flautt
Data Management Unit
Program Planning and Management Section
Division of Solid & Hazardous Waste Management

JFF/dhs

cc: George Hamper, U.S. EPA, Region V
Rebecca Strom, U.S. EPA, Region V
Dan Fisher, Ohio EPA, DSHWM, TA&ES
Mark Bergman, Ohio EPA, DSHWM, NEDO
Carl Gulla, Cuyahoga Engineering Services

1013R

PUBLIC NOTICE

Cuyahoga County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Technicare Corporation, US EPA ID No.: OHD055827489, Ohio Permit No.: 02-18-0223, 29100 Aurora Road, Solon, Ohio 44139. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Cleveland Public Library, 325 Superior Avenue, Cleveland, Ohio 44114 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Program Planning and Management Section, Attn: James F. Flautt, Box 1049, 361 E. Broad Street, Columbus, Ohio 43216-1049.

architectural engineering
services
civil engineering
services
professional engineers
registered in ohio

03-18-0223
CUYAHOGA ENGINEERING SERVICES

OHD 055827489

March 10, 1987

Mr. Warren Tyler
Director of Ohio EPA
2110 E. Aurora Road
Twinsburg, Ohio 44087

Mr. Tyler:


Technicare, a division of Johnson and Johnson Family of Companies, located at 29100 Aurora Road, Solon, Ohio is officially closing their Hazardous Waste Storage Facility.

Enclosed is the official closure plan containing all required details and operations for your review and records.

A copy of this plan has been submitted to Ohio EPA on Thursday, March 5, 1987.

The undersigned is acting as Technicare's Consulting Engineer. If you have any questions, please contact us at your convenience.

Sincerely,


Cuyahoga Engineering Services
Carl P. Gulla, Jr., PE
Reg. No. 30968

CPG:vb

cc: Tom Copeland - The Technicare Corporation
Mark Burgman - Ohio EPA

Enclosure

RECEIVED
OHIO EPA

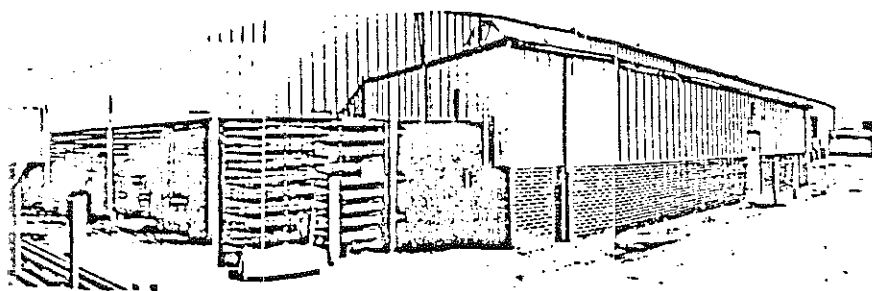
MAR 17 1987

DIV. OF SOLID & HAZ. WASTE MGT.

RECEIVED

MAR 11 1987

OHIO EPA-N.E.D.O



Technicare Hazardous Waste Facility

The
Technicare Corporation
Hazardous Waste Facility
Closure Plan

RECEIVED

MAR 11 1987

OHIO EPA-N.E.D.O.

Prepared by:
Cuyahoga Engineering Services
Carl P. Gulla, Jr., PE
(216) 473-6807

THE TECHNICARE CORPORATION
HAZARDOUS WASTE FACILITY
CLOSURE PLAN

Prepared by: Cuyahoga Consulting Engineering Services

Carl P. Gulla, Jr., PE

CUYAHOGA CONSULTING ENGINEERING SERVICES
6556 Maplewood Drive
Mayfield Heights, Ohio 44124
(216) 473-6807

TECHNICARE HAZARDOUS WASTE CLOSURE PLAN

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EXHIBITS

Technicare Aurora, Cochran Roads Site Plan	Exhibit One
Detail Sketch of The Hazardous Waste Facility	Exhibit Two
List of Hazardous Wastes	Exhibit Three
Construction Drawings of Facility	Exhibit Four
Sketches Detailing Closure Operations	Exhibit Five
Schedule of Events	Exhibit Six
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DESCRIPTION OF FACILITY

The Technicare Corporation, a division of The Johnson & Johnson Family of Companies, is located at 29100 Aurora Road, Solon, Ohio.

At this location Technicare has five (5) buildings that are described as follows:

Buildings A, B and N
Building H
Building C

The Technicare Corporation is a High Technology Company that develops and manufactures Diagnostic Imaging Equipment.

The Hazardous Waste Facility is located on the south side of Building C (refer to Exhibit 1 - Site Plan). This facility is an approximately 1080 square foot explosion proof addition to Building C containing an exhaust system, to the outside air, blow-out wall panels, and a drainage system that drains to a 500 gallon underground concrete tank. This tank is located outside the building walls, just west of the explosion proof addition and south of building C. The Facility also utilizes an outside, 17' by 14' Empty Drum Storage Area adjacent to and just west of the Addition, enclosed with wood partitions (see exhibit - 2).

The above described Facility including the 55' by 20' Explosion Proof Addition, 6' by 4' by 6' Underground Storage Tank, and the 17' by 14' Outside Empty Drum Storage Area is the Technicare Hazardous Waste Facility to be closed.

DESCRIPTION OF EXISTING BUILDING SAFETY SYSTEMS

The explosion proof addition contains a sprinkler system, blow-out wall panels, explosion protected lighting system, air exhaust system, and a floor emergency drainage system that drains to a 6' by 4' by 6' Underground Tank. The nearest fire alarm pull box is located adjacent to the main entrance door to the Explosion Proof Addition on the south wall of Building "C". Emergency Breathing Apparatus is located at the north entrance of Building C, at the Security Office (see exhibit - 2).

LIST OF HAZARDOUS WASTE

A complete list of the hazardous waste generated by The Technicare Corporation is attached to this Closure Plan and noted as Exhibit - 3.

CLOSURE PLAN SUBMITTALS AND APPROVALS

(1) The Technicare Facilities Manager, just prior to the submittal of this Closure Plan for approval, must contact Ohio EPA for a physical inspection of the Hazardous Waste Facility. The inspection may be necessary to determine detailed content of the plan.

(2) The Technicare Facilities Manager must submit a request for PERMIT REVISION 120 days in advance of the last day of use of the Hazardous Waste Facility to Tom Crepeau, Data Management Section, DSHWM, Columbus, Ohio. This closure plan recommends that the Permit Revision be submitted at the same time that this Closure Plan is submitted for approval.

(3) Although it is difficult to determine at this time when Technicare will cease all manufacturing operations, All Hazardous Waste should be disposed of in the normal manner described by The Technicare Compliance Manual. The underground 500 gallon tank shall also be emptied in accordance with the requirements of Ohio EPA after all other waste has been removed from the facility. At the time when it can be determined when Technicare will cease operations, a plan or schedule shall be drawn up by The Technicare Facility Manager, indicating when ALL Hazardous Waste will be removed. All hazardous waste must be removed from the Hazardous Waste Facility within 90 days after receiving the final volume of hazardous waste. In any case, no actual Closure Operations should commence until all Hazardous Waste is removed from the Hazardous Waste Facility and when the letter of approval from the Director of Ohio Epa is received.

(4) The Technicare Facilities Manager must submit this closure plan for approval to OHIO EPA 180 days prior to the commencement of actual closure. This 180 day period may be shortened only at the discretion of OHIO EPA. During the 180 day period the following events will occur:

* PRELIMINARY REVIEW - Immediately after receipt of this closure plan OHIO EPA conducts a preliminary review. If the plan is judged to be incomplete or inadequate, it will be rejected and written comments will be sent to the Technicare Facilities Manager.

At this point, the Closure Plan must be corrected and resubmitted to OHIO EPA for approval. If the Closure Plan is judged substantially complete then OHIO EPA may immediately provide for PUBLIC NOTICE and conduct a DETAILED REVIEW. These items will occur simultaneously.

THE TECHNICARE CORPORATION
FACILITY CLOSURE PLAN
August 9, 1986
PAGE THREE

* PUBLIC NOTICE - Ohio EPA will publish The Technicare Closure Plan in its Ohio EPA Weekly Review and in a newspaper of general circulation in Cuyahoga County. Notification of this action will be sent to The Technicare Facilities Manager, the District Office and Region V, with a copy of the Closure Plan to the Main Cleveland Public Library. EPA's Data Management Section will receive all public comments and submit them to EPA's Technical Assistance and Waste Management Section. Comments are prepared and sent to The Technicare Facilities Manager and responses sent to the public commentators. At this point corrections may have to be made to this Closure Plan. The 30 day comment period must end before the Director of OHIO EPA can approve this closure plan.

* DETAILED CLOSURE PLAN REVIEW - Upon completion of the detailed review OHIO EPA will submit written comments to The Technicare Facilities Manager. The Facilities Manager must revise the Closure Plan within 30 days from the receipt of these comments. OHIO EPA is required to complete the Detailed Review of this closure plan or a revision of this closure plan within 90 days of receipt.

* DIRECTOR'S APPROVAL LETTER - The Ohio EPA Director will Approve, Modify, or Disapprove the Closure Plan within 90 days after the receipt of revisions from the Technicare Facilities Manager and after the close of the 30 day public comment period.

Approval of this Closure Plan may only be granted by a letter from the Director of Ohio EPA. After the Director's approval Ohio EPA then publishes a public notice in their Ohio EPA Weekly Review and in a general circulated newspaper in Cuyahoga County. The final action may be appealed to the Environmental Board of Review.

SUMMARY OF SUBMITTALS PRIOR TO CLOSURE OPERATIONS

- 1> Contact EPA for preliminary inspection prior to submittal of closure plan.
- 2> Submit a request for Permit Revision 120 days prior to last day of Waste Facility use.
- 3> Begin removing all hazardous waste from facility, empty underground storage tank after other waste has been removed, all waste must be removed within 90 days after last volume of waste was received, closure cannot commence until all waste has been removed AND letter of approval is received.
- 4> Submit Closure Plan to EPA for approval 180 days prior to commencement of actual closure.
- 5> MAY have to resubmit Closure Plan after PRELIMINARY REVIEW.
- 6> Revise Closure Plan within 30 days from receipt of comments from EPA due to PUBLIC NOTICE responses and DETAILED CLOSURE PLAN REVIEW.
- 7> Closure Plan will be considered approved upon receipt of DIRECTOR'S APPROVAL LETTER.
- 8> Closure Operations may commence if:
 - a> All hazardous waste has been removed from the facility
 - b> No appeal made to the Environmental Board of Review
 - c> Letter of approval received

CLOSURE OPERATIONS

MANAGEMENT

1> THE TECHNICARE FACILITIES MANAGER will direct all phases of the closure operations as described by this plan.

2> A REGISTERED PROFESSIONAL ENGINEER, registered in Ohio, will inspect and certify the several operations as outlined in the plan. The Registered Engineer must be independent, meaning he cannot be directly employed by The Technicare Corporation or any subsidiary of Johnson & Johnson. The Engineer must be an "outside" consultant.

3> OHIO EPA must make inspections at several times during the operations as described in the plan.

4> A TESTING LABORATORY, approved by Ohio EPA will conduct the several tests called for in the Plan.

5> CONTRACTORS will perform the work as specified and described here-in under the direction of The Technicare Facilities Manager.

CONTRACTOR APPROVALS

The Technicare Facilities Manager shall submit to Ohio EPA those names of contractors for approval, in writing, at least two (2) weeks prior to the commencement of the portions of work to be performed by said Contractors. Ohio EPA is expected to expedite the approval, non-approval, or recommendation within a time period in order that the schedule dictated by this Plan is not impeded. This approval procedure is designed to assure that the Ohio EPA requirements are carried out to the fullest degree of compliance with a positive attitude to the requirements of this Closure Plan.

In the event Technicare decides to use their own forces to perform all or portions of the work, The Technicare Facilities Manager must employ only those employees that are thoroughly familiar with this Closure Plan and Ohio EPA rules, regulations and requirements for work of this nature.

SCHEDULE

The Closure Operations must be completed within 180 days of the "official" commencement. This Closure Plan contains a schedule showing all events required to complete the operation and is calculated for the worst conditions (see Exhibit-6). However, if for some reason beyond the control of The Technicare Facilities Manager, the schedule cannot be met, The Facilities Manager must make a request to OHIO EPA for an EXTENSION OF TIME. This Extension of Time request must show all reasons for the delay(s) and amount of additional time required to complete all operations.

ACCIDENTAL SPILLS

During the final removal of Hazardous Waste, prior to the commencement of CLOSURE, accidental spills or unwarranted contamination of The Waste Facility may occur. These accidental spills or unwarranted contamination shall be collected or disposed of to the satisfaction of The Technicare EPA compliance Manual and the Ohio EPA regulations that govern such occurrences. In any case, such occurrences must be remedied prior to the commencement of CLOSURE OPERATIONS. At the point of CLOSURE OPERATIONS all Hazardous Wastes shall be removed, including spills, etc., or any other situation that may occur that contaminates the Facility. Any such operation that remedies such situations shall be considered an event of action in the "Removal of Hazardous Wastes from the Facility" and will not be considered part of the CLOSURE PLAN OPERATION. Closure Operations cannot commence until these parameters are satisfied and completed within the 90 day removal of Hazardous Waste period described here-in and above. However, this Closure Plan has included moneys in the Cost of Implementation to cover the last removals of hazardous waste from the facility (see Exhibit-7).

TESTING PROCEDURES

Refer to Exhibit Eight. All testing procedures and detection limits of the tests are described in this exhibit. "Clean Limits" for soil tests are also defined.

CODE AND SPECIFICATION COMPLIANCE

All Contractors when performing the work shall conform to the Technicare "General Conditions" and Technicare "Special Conditions", all EPA, OSHA, and other local authorities codes and regulations.

SECURITY

The Contractors shall familiarize themselves with Technicare Security Policies. These policies must be abided by and will become part of the contracts between the Contractors and Technicare.

CLOSURE OPERATIONS

Prior to the commencement of the work the Technicare Facilities Manager shall inform any contractors scheduled to complete the work all local building safety devices described earlier in this Plan.

THE SCOPE OF THE WORK

The logic of the Closure Plan's schedule indicates that there are three major items of work and they should proceed in the following order:

- 1> Decontamination of the explosion proof addition.
- 2> Removal or Abandon of the 500 gallon tank
- 3> Decontaminate the exterior Empty Drum Storage area.

(A) DECONTAMINATION OF THE EXPLOSION PROOF ADDITION

The contractor shall perform the following work as described by the plans (Exhibit - 5) and this Closure Plan and is not limited to but includes the following work:

(A.10) Seal the wall/floor drains, located at floor level of The Explosion Proof Addition, draining to the exterior, with concrete grout or concrete masonry units. This work shall be performed in accordance with all local Building Codes.

(A.20) Assure that the interior drainage system is working and draining to the Exterior Underground, 500 gallon tank.

(A.30) Using an approved high pressure steam generator, cleans all walls, ceilings, floor, trench drain, floor drains, wire partitions and other building items that are inside The Explosion Proof Addition. BE SURE all effluent has drained to The Underground Storage Tank.

(A.40) At least two (2) workers minimum should perform this work described in A.30. Working apparel shall be a standard spray painter's uniform, nose mask, safety glasses and safety shoes. After the work has been completed the face mask and spray painter's uniform shall be incinerated, the other apparel shall be rinsed at least twice with water.

(A.50) After the above work has been completed the Technicare Facilities Manager shall have samples taken by an approved Testing Laboratory. Samples shall be taken of the walls, ceiling and floor and the effluent now present in the underground tank. If the samples from the floor, walls and ceiling prove to be within the Ohio EPA tolerances the Technicare Facilities Manager shall have the Registered Engineer certify that this phase of the work is in compliance; shall have the area inspected by Ohio EPA for approval. The structure should then be locked to prevent any ingress to the structure. If the above mentioned samples of the floor, walls and ceiling prove to be contaminated then work items A.20 to A.50 shall be repeated until these samples are safe.

(A.60) Soon after the explosion proof addition has been decontaminated and the work approved by the stipulated Principals, The Technicare Facilities Manager shall DECONTAMINATE the Underground Tank. Tap water shall be added to the tank to further dilute the effluent and this effluent shall then be removed as if it were contaminated.

The tank shall twice more be filled with tap water and removed each time as hazardous waste. A sample shall be taken of the last effluent removed from the tank; if this sample indicates more than 1 mg/liter of any RCRA regulated waste solvent repeat the process in this paragraph until the sample indicates 1 mg/liter or less of any RCRA regulated waste solvent. The tank will be considered DECONTAMINATED at this point.

(B) REMOVAL OF THE 500 GALLON UNDERGROUND TANK

(B.10) Prior to the commencement of the work under this sub heading the Technicare Facilities Manager shall have the following samples taken by the approved Testing Laboratory:

- 1> Ground water from the existing monitoring well
- 2> Two (2) soil samples of backfill (see Exhibit 5)
- 3> Two (2) soil samples outside of tank backfill
- 4> One soil sample in the near vicinity, used as BACKGROUND

Using the BACKGROUND test as a basis, the results of these tests will determine what two methods of closure will be taken and the extent (if any) of the removal of soil. The two methods of Closure regarding the underground tank are briefly described below:

(B.20) REMOVAL - The tank shall be removed and disposed of in accordance with Ohio EPA regulations. The adjacent "Tank Backfill" shall be removed and disposed of in accordance with Ohio EPA regulations. The adjacent soil to the backfill soil shall be removed to the extent dictated by the soils tests and disposed of in accordance with Ohio EPA regulations. The sewer from the Explosion Proof Addition shall be plugged as per Exhibit - 5. This work shall be performed in accordance to all local building codes. All excavations shall be backfilled with approved soil and installed to conform with all local building codes.

(B.30) ABANDONED - The tank shall be filled with clean approved soil and all access manholes sealed with concrete. The sewer from the Explosion Proof Addition shall be plugged as per Exhibit - 5 and backfilled in accordance with all local building codes. The sewer pipe and vent leading into the tank shall be removed and the openings in the tank shall be sealed with cement grout.

(B.40) The Technicare Facilities Manager, the Registered Engineer, the approved Testing Laboratory and Ohio EPA shall jointly make the decision as to what method of Closure is to be used for The Underground Tank and they shall base their decision on the test results. However, this closure plan's cost estimate and schedule for Closure is based on the "worst" conditions.

(B.50) In the event it is deemed, by the above principals, that the soil is contaminated and the test results for soil samples outside the "tank backfill" (test 3> above) are negative, then two (2) more samples, three (3) feet further away from the tank (or a distance decided by the Principals), shall be taken. If these samples are deemed safe then the extent of the soil removal will be the distance from the test holes to the perimeter of the tank and as deep as the test was taken (recommend ten feet deep tests). If the test results are still deemed unsafe two (2) more test shall be taken three (3) feet further away from the tank. This process shall continue until safe samples are found. The distance from the last approved test to the tank will then dictate the extent of soil removal.

(C) SPECIFICATIONS FOR REMOVAL OF THE 500 GALLON TANK

(C.10) After all tests have been completed as described above for this section of the specifications, and the designated principals have decided that removal of the tank is in order and the limits of excavation are outlined, the Technicare Facilities Manager shall instruct the contractor, that is performing this work, the outline and limits of excavation to be removed and disposed of. The price for this work shall be paid for on both a lump sum basis and a unit price basis.

The bid pricing for this work submitted by the contractor shall include a lump sum price for removing the soil as outlined by the first set of soil tests and in Exhibit-5; and shall include a unit price per cubic yard of excavation and disposal of all other soil deemed to be removed over and above that outlined above.

The contractor shall then proceed to remove and dispose of the wood partitions as described in Exhibit-5 and complete the excavation operation.

(C.20) After the excavation operation has been completed the contractor shall disconnect the drain and vent leading to the 500 gallon tank and remove the tank and dispose of the same in accordance with Ohio EPA regulations.

(C.30) After the Explosion Proof Addition has been deemed safe and decontaminated, the contractor shall seal the existing floor drains with 3000 psi concrete as detailed in exhibit - 5 and thereby abandoning the Addition's drainage system.

(C.40) The contractor shall backfill the tank excavation and sewer excavation with approved material and shall comply with ODOT Construction and Materials Specifications. Compaction for underpavement backfill shall be 95%, compaction, other backfill shall be 80% compaction.

(C.50) After all excavation has been completed all equipment used in completing this excavation shall be physically cleaned off and the soil debris shall be disposed of in the same manner as the excavated material. After removal of this soil from the equipment, the equipment shall be flushed with water at least twice to remove all traces of soil. This effluent shall be entrapped and contained in 55 gallon drums and disposed of as per Ohio EPA regulations.

(C.60) The excavation must be disposed of in a manner that will comply with Ohio EPA regulations. This excavation material should be placed in trucks when excavated and these trucks shall dispose of the excavation at a SECURED LAND FILL that is in compliance with all regulations of Ohio EPA. If these transporting vehicles must be ODOT or EPA approved, the contractor shall comply with these regulations. In the event that the contractor can use his own trucks or transporting equipment, after disposal of the excavation the contractor must rinse this equipment, at least twice, and dispose of the effluent in accordance with Ohio EPA regulations.

(C.70) Upon completion of the tank removal or this section of the plan The Facilities Manager shall inform the Registered Engineer and Ohio EPA of this completion and request an inspection and certification for this portion of the work.

(D) SPECIFICATIONS FOR ABANDONING THE 500 GALLON TANK

(D.10) After all tests have been completed as described above in section (B), and the designated principals have decided that the tank should be abandoned, The Facilities Manager shall instruct the contractor to commence work as described below and in this section.

(D.20) The contractor shall remove and dispose of the wood partitions and immediately disconnect the sewer pipe and vent from the Explosion Proof Addition to the tank and seal the Addition's interior drains as described in Article C.30.

(D.30) The openings in the tank where the sewer pipe and vent entered shall be sealed with cement grout. The sanitary sewer excavation shall be backfilled in accordance with ODOT Construction and Materials Specifications.

(D.40) The contractor shall completely fill the tank with material chosen and approved by the local building authorities.

(D.50) After the tank has been filled with soil or stone the contractor shall remove the manholes covers and seal the openings with concrete.

(D.60) After the concrete has cured the contractor shall backfill the tank area with soil in accordance with ODOT Construction and Material Specifications.

(D.70) Upon completion of this portion of the work under this section The Facilities Manager shall request the Registered Engineer and Ohio EPA to inspect and certify the work.

(E) DECONTAMINATION OF THE EXTERIOR EMPTY DRUM STORAGE AREA

(E.10) After all of the above portions of the work have been completed the Hazardous Waste Facility should be in an acceptably neat order. If any unwarranted spills of Hazardous Waste occurred during any of the above operations The Facilities Manager shall remove and dispose of these spills in the normal manner in accordance with The Technicare EPA Compliance Manual. Prior to the performance of the work described in this section all Hazardous Materials shall have been removed from the site.

(E.20) After all of the above work has been completed The Facilities Manager shall instruct the approved Testing Laboratory to take samples of the areas where:

- 1> Two (2) tests where the empty drum storage area exists
- 2> Two (2) more tests in areas where contaminated soil existed (take these two (2) tests only if it was necessary to remove the tank and the soil was deemed contaminated.

When the test results are available the Registered Engineer, Ohio EPA, and The Facilities Manager shall decide if it is necessary to remove any contamination of the site in the normal manner for such removals.

(E.30) If the principals decide that the residue on the site is not dangerous, the entire Hazardous Waste Exterior area and areas in the near vicinity shall be hosed down twice and the effluent shall be drained to the nearby storm sewer catch basin, just south of the Explosion Proof Addition.

(E.40) If the samples are deemed too dangerous by the principals then the area where the samples were taken shall be flushed but the effluent shall be contained in 55 gallon drums and disposed of in the normal manner described by The Technicare EPA Compliance Manual.

(E.50) After the specific areas have been decontaminated then the entire area shall be hosed down at least twice and the effluent drained to the nearby storm catch basin.

(E.60) Upon completion of this last operation The Facilities Manager shall request an inspection from Ohio EPA and The Registered Engineer in order to obtain certification and approval that the Technicare Hazardous Waste Facility has been officially closed.

(E.70) After certification by the Registered Engineer and approval by Ohio EPA as to Final Closure of the Facility, the contractor shall pave the excavated/backfilled areas with two (2) inches of bituminous asphaltic concrete in accordance with ODOT Construction and Material Specifications. Areas to be paved will certainly be determined by the specific method used regarding the Underground Tank.

PROGRESS REPORTS TO OHIO EPA

During the course of the Closure Operations several Progress Reports must be submitted to Ohio EPA.

A NOTICE OF COMMENCEMENT in writing must be submitted five (5) days prior to the Closure Operation commencement.

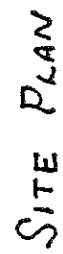
A NOTICE TO TAKE SAMPLES in writing must be submitted five (5) days prior to any testing or sampling.

A PROGRESS REPORT in writing must be submitted every thirty (30) to sixty (60) days to Ohio EPA. This progress report shall report on the status of the project, time required to complete the project, Professional Engineer's current Certifications, include current test results, and any other pertinent information regarding the project. A Progress Report shall be submitted midway during the project and shall be so noted as THE MIDWAY PERIOD PROGRESS REPORT.

A COMPLETION NOTICE in writing shall be submitted to Ohio EPA in order that they can make their final inspection.

*** EXHIBIT 1 ***

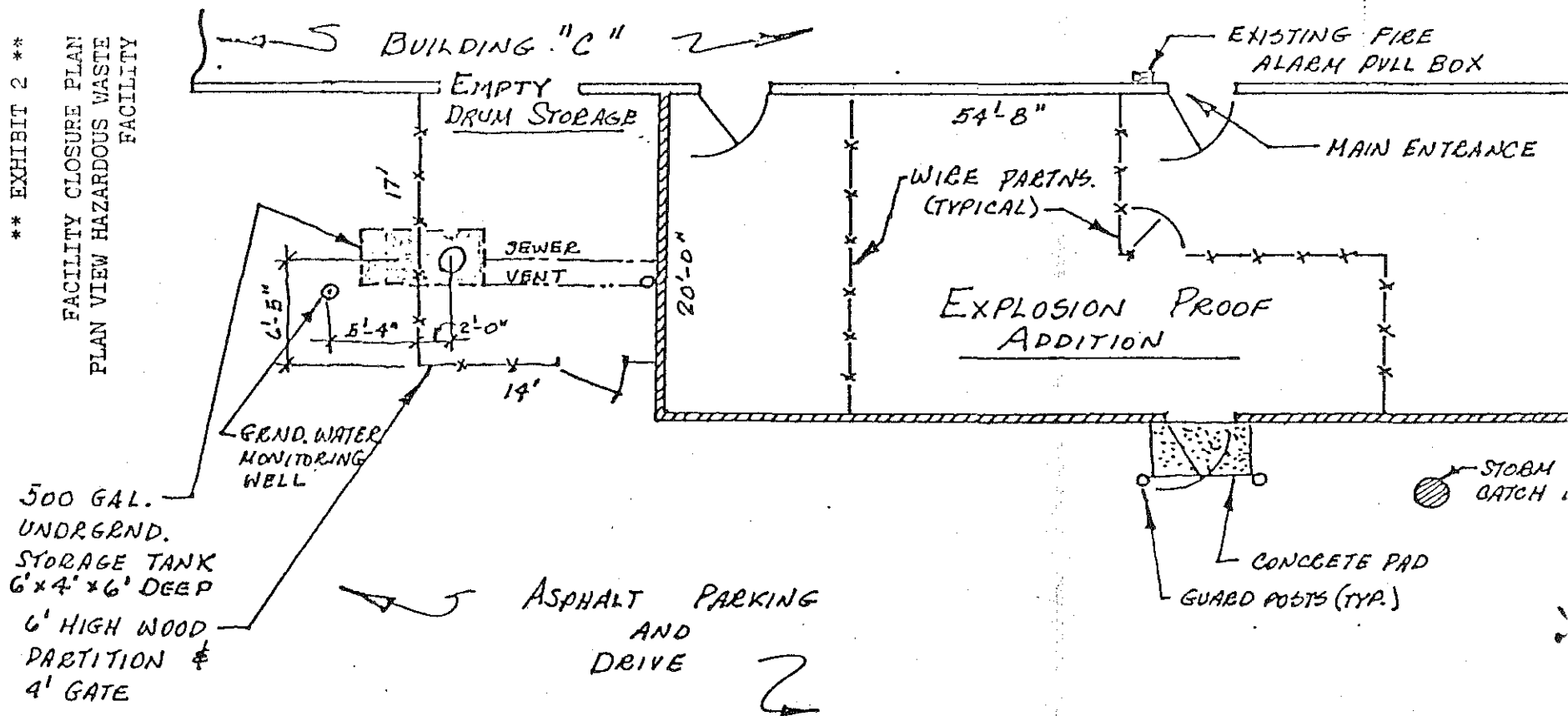
HAZARDOUS WASTE



THE TECHNIZARE CORPORATION

EXHIBIT 2

FACILITY CLOSURE PLAN
PLAN VIEW HAZARDOUS WASTE
FACILITY



EMERGENCY BREATHING
APPARATUS LOCATED
NORTH ENTRANCE TO
BLDG. "C", DOOR NO. 7,
AT THE MAIN SECURITY
OFFICE

EXHIBIT-2
EXISTING TECHNICARE HAZARDOUS
WASTE FACILITY

SCALE: 1/8" =

FACILITY CLOSURE PLAN
LIST OF HAZARDOUS WASTES

MATERIALS STORED IN HAZARDOUS WASTE FACILITY

1,1,1, Trichloroethane
Freon TMS
Waste Paint Liquid
Alcohol
Waste Mineral Oil
Waste Cutting Fluid
Waste Petroleum Oil
Ferric Chloride
Ammonium Hydroxide
Acetone
Methylene Chloride
Cresylic Acid
Waste Laquer Thinner Liquid
Waste Paint Sludge and Oil
Copper Sulfate
Waste Graphite Solution
Tin-Lead Acid Solution
Hydrochloric Acid
Sulfuric Acid
Nitric Acid Solutions
Fiberglass Resin
Fiberglass Hardner
Waste Adhesives
Waste Detergents

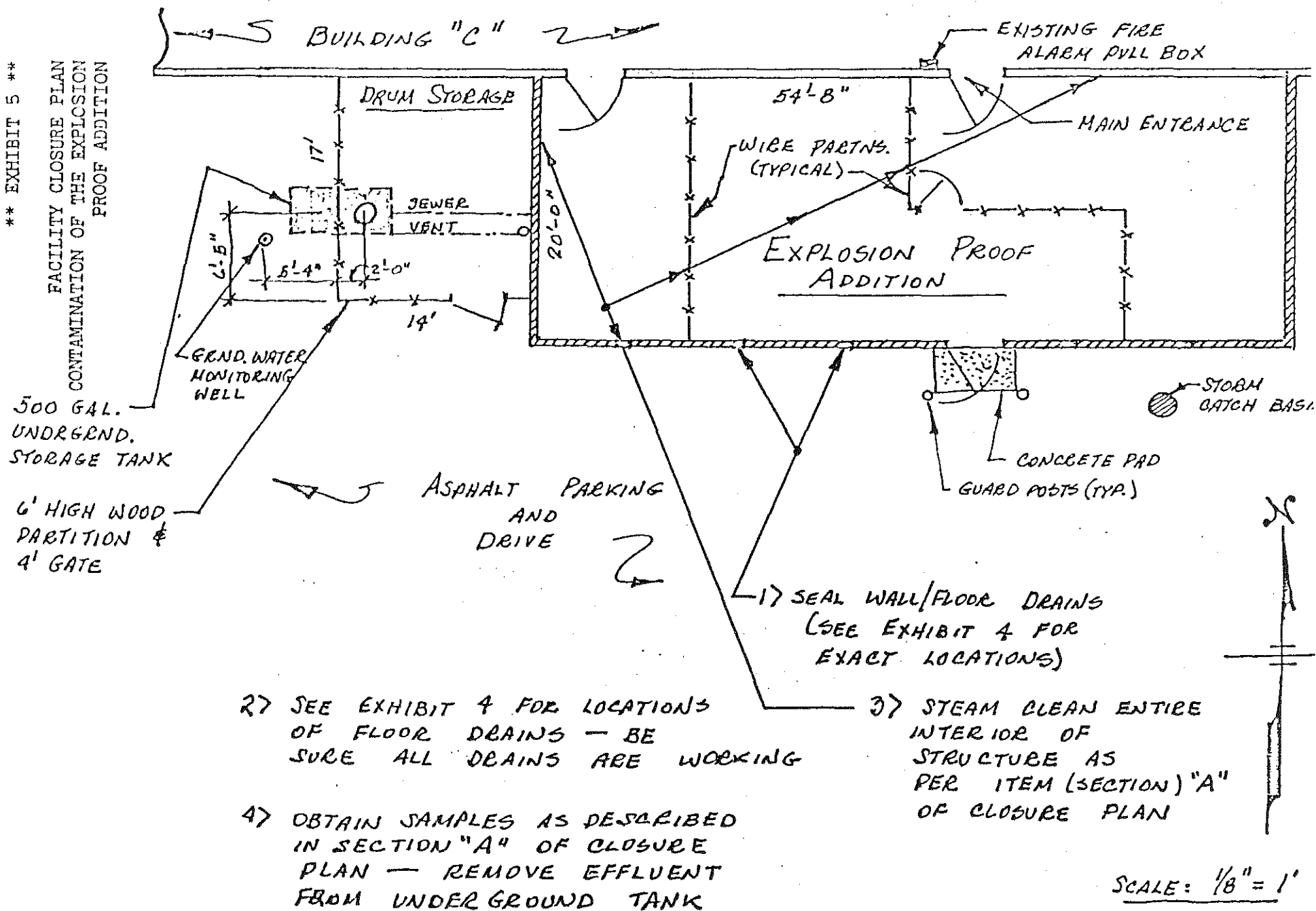
** EXHIBIT 4 **

FACILITY CLOSURE PLAN
ORIGINAL CONSTRUCTION DRAWINGS

Original Construction Drawings, prepared by Charles McGettrick, dated March 18, 1981, become Exhibit 4 of this Facility Closure Plan

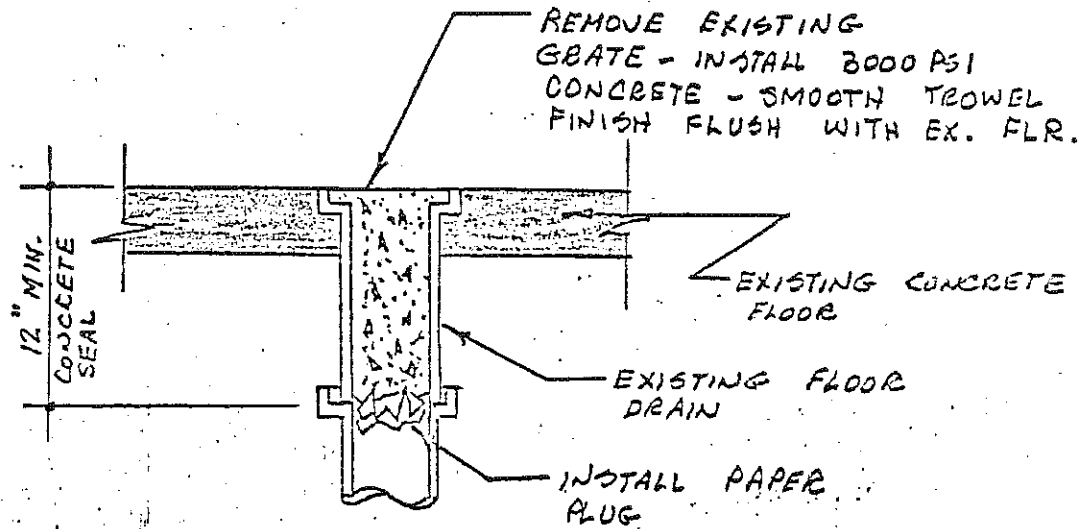
** EXHIBIT 5 **

FACILITY CLOSURE PLAN
CONTAMINATION OF THE EXPLOSION
PROOF ADDITION

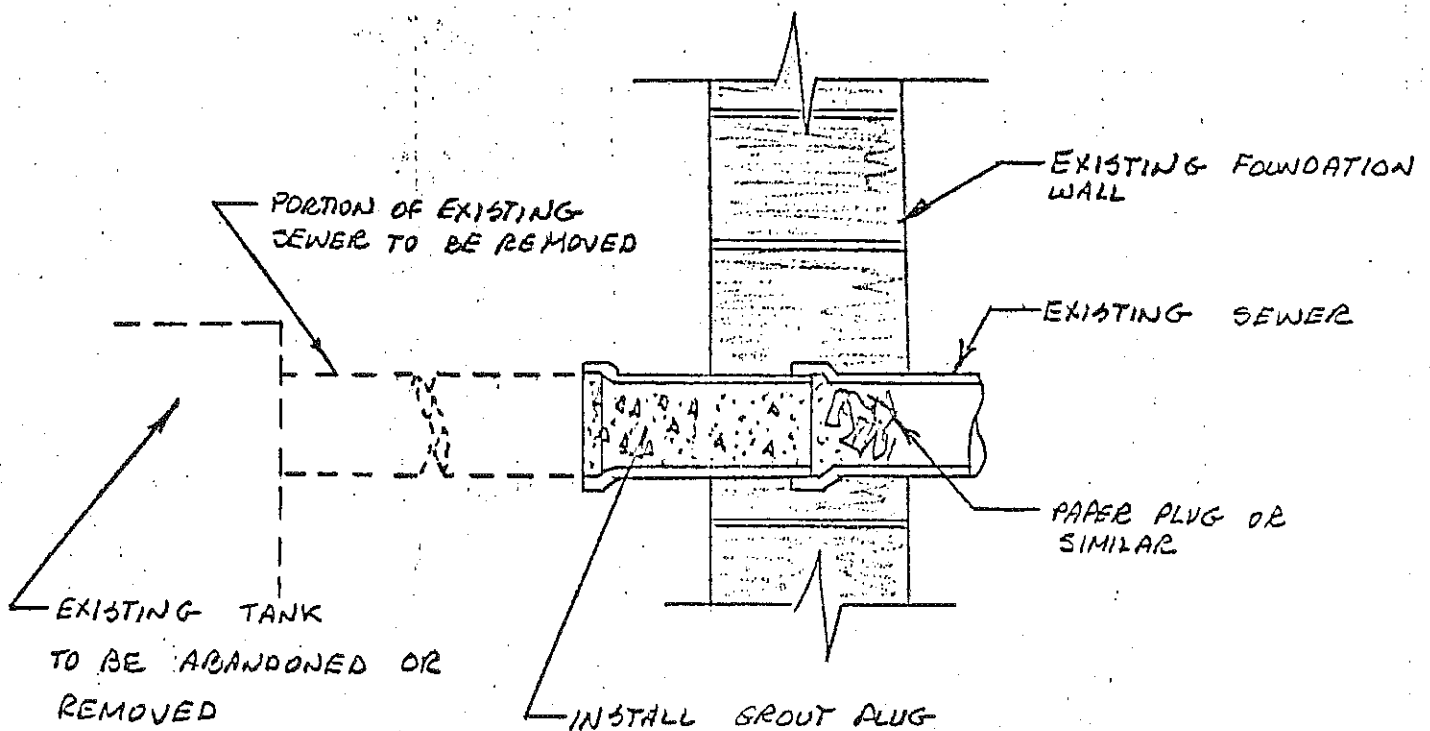


DECONTAMINATION OF EXPLOSION PROOF
ADDITION

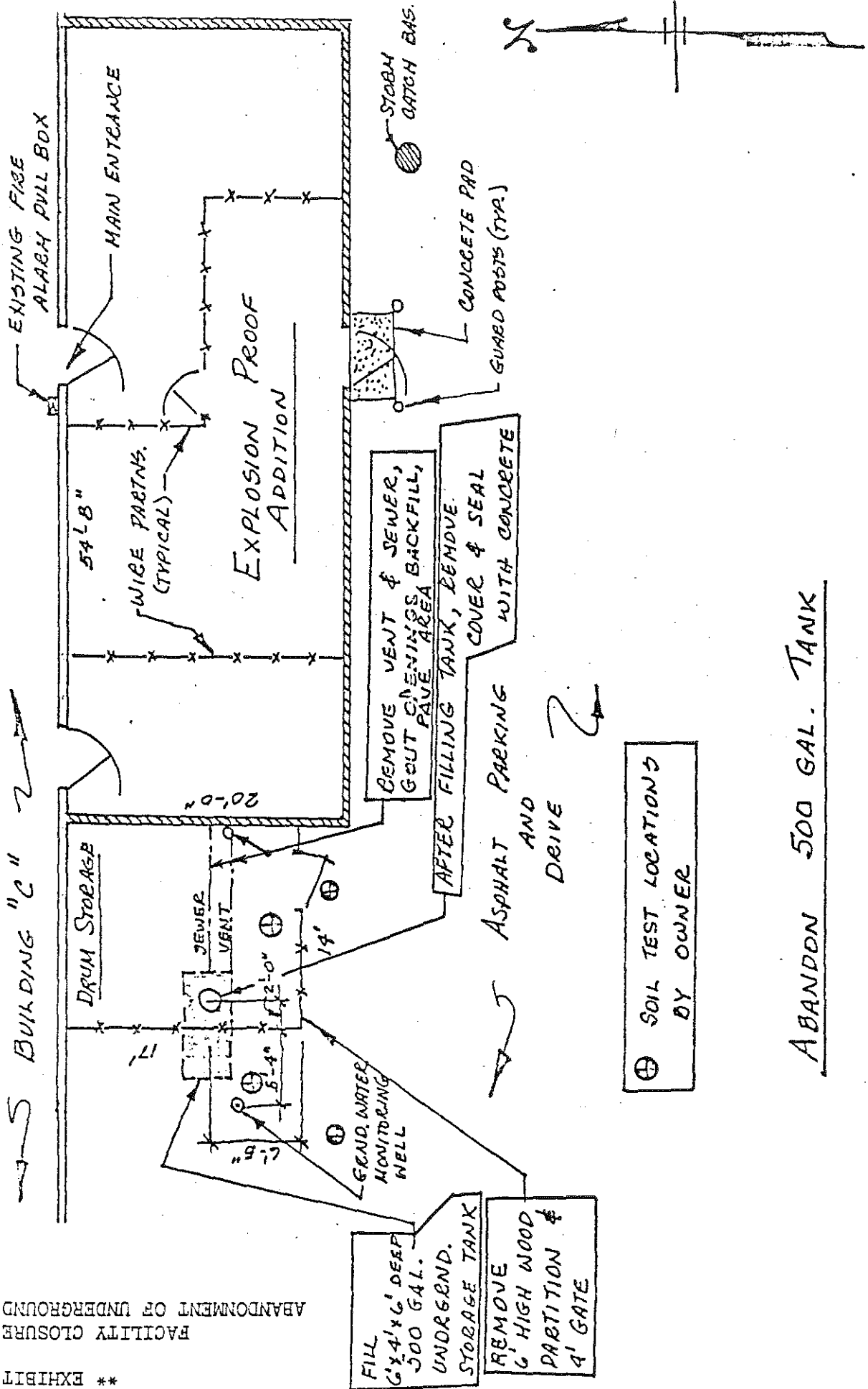
FACILITY CLOSURE PLAN
SEAL AND ABANDON DRAINAGE SYSTEM



SEAL ALL INTERIOR FLOOR DRAINS
TYPICAL DETAIL

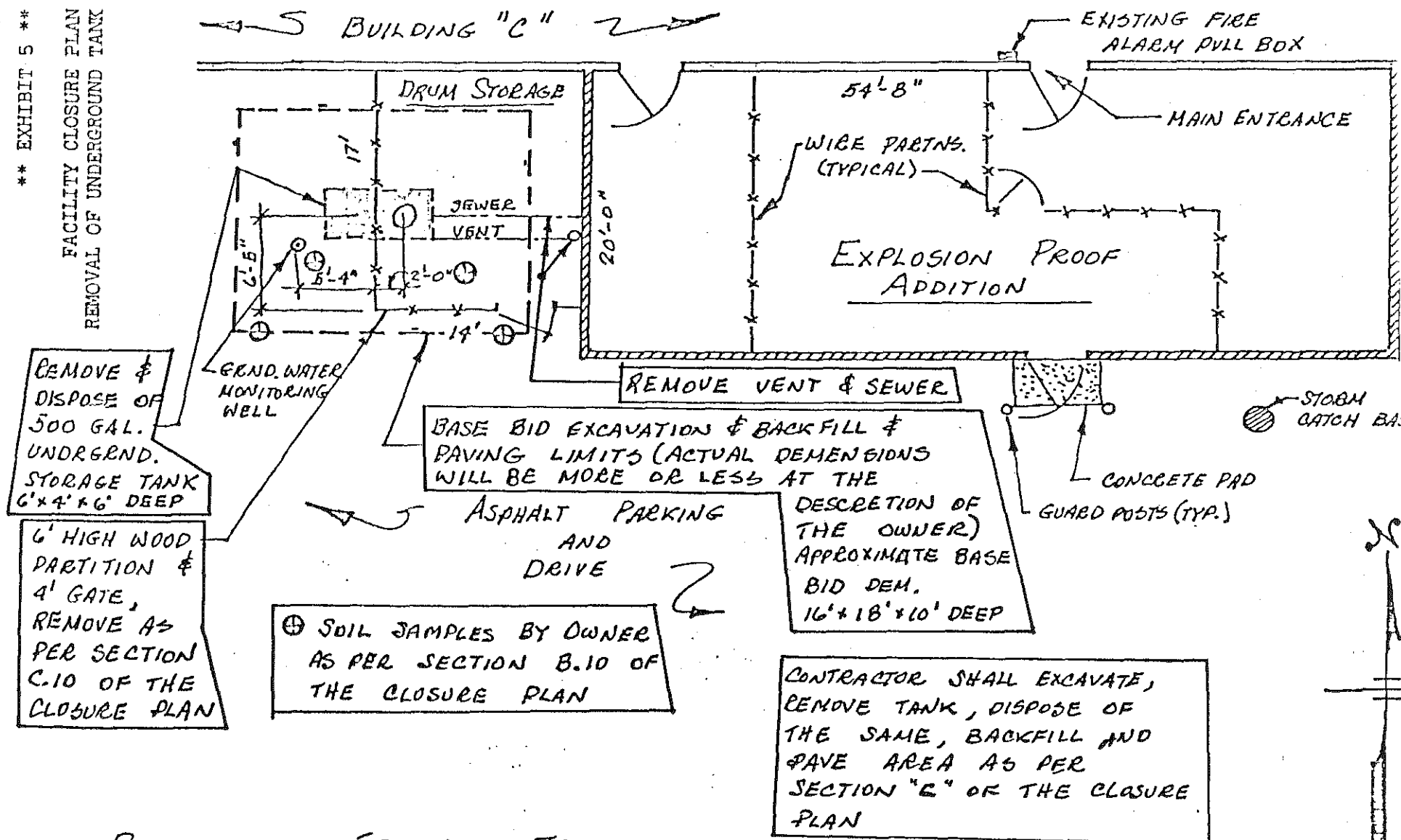


SEAL SEWER FROM FLOOR DRAINS
TO UNDERGROUND STORAGE



ABANDON 500 GAL. TANK

** EXHIBIT 5 **
 FACILITY CLOSURE PLAN
 REMOVAL OF UNDERGROUND TANK



REMOVAL OF 500 GAL. TANK

SCALE: $\frac{1}{8}" = 1'$

FACILITY CLOSURE PLAN
SCHEDULE OF EVENTS
PAGE ONE

SCHEDULE OF EVENTS (WORST CONDITIONS)

CLOSURE OF TECHNICARE HAZARDOUS WASTE FACILITY

This Schedule has been prepared under the assumption of "worst" conditions. Specifically, it was assumed that the first "cleansing" effort of the Explosion Proof Addition did not pass and rework and more testing were required; it was also assumed that the Underground Storage Tank had to be removed; and it was assumed that the first soil samples taken outside the "backfilled" soil were contaminated and more samples were necessary prior to tank removal. These assumptions dictate the longest time required to perform the Closure.

Time from Day Zero	Description of Event	Inspection Personnel	Section Number	Duration in days
2	Removal of 30 drums of Hazardous Waste and 500 gallons of Effluent. Remove all empty Drums from the Site	None	—	2
5	Seal Wall Drains in Explosion Proof Addition	None	A.10	3
8	Decontaminate Explosion Proof Room	None	A.20 to A.40	3
50	Tests: Walls, Ceilings, Floors, of Explosion Proof Room, Effluent, Grnd Water and Soil: Decide Method of Tank Disposal	Fac Mgr, Testing Lab, Ohio EPA, Reg Eng	A.50, B.10 and B.40	42
52	Remove Effluent from Tank	None	A.60	2
55	Decontaminate Explosion Proof Room	None	A.20 to A.40	3
97	Tests: Walls, Ceilings, Floors of Explosion Proof Room Effluent, and Additional Soil	Fac Mgr, Testing Lab, Ohio EPA Reg Eng	A.50	42
98	Decontaminate Underground Tank	Fac Mgr	A.60	1
101	** Certify Closure of Explosion Proof Room (Partial)	Fac Mgr, Ohio EPA Reg Eng	A.50	3
103	Remove Effluent from Tank	None	A.60	2

FACILITY CLOSURE PLAN
SCHEDULE OF EVENTS
PAGE TWO

Time from Day Zero	Description of Event	Inspection Personnel	Section Number	Duration in days
110	Excavate and dispose of Soil Remove and Dispose of Tank Abandon Drainage System Backfill Tank Area Clean Equipment	Fac Mgr Ohio EPA	C.10, C.60 C.20 C.30 C.40 C.50	7
110	** Certification of Tank Removal or Abandonment	Fac Mgr, Ohio EPA, Reg Eng	C.70 or D.70	0
151	Test Surface of Exterior Hazardous Waste Site (Empty Drum Storage Area: Decide Disposal	Fac Mgr, Testing Lab, Ohio EPA Reg Eng	E.10, E.20 E.30	42
155	Remove Contamination from Site	None	E.40	3
157	Flush Entire Hazardous Waste Site with Water (twice)	None	E.50	2
160	** Inspect Hazardous Waste Facility and Exterior Site: CERTIFY	Fac Mgr, Ohio EPA, Reg Eng	E.60	3
167	Asphalt Paving	Fac Mgr	E.70	7

TECHNICARE HAZARDOUS WASTE FACILITY CLOSED

The schedule has been designed for worst conditions. As you can see the actual work in the Closure Operation does not require that much time. The longest time is required for testing (we have assumed a six (6) week period for testing which includes taking the samples, obtaining results, analysis, and some time for unforeseen conditions). If more testing is required due to failure of some of the test, it may be advantageous for the Facilities Manager, at this time, to request an EXTENSION OF TIME.

FACILITY CLOSURE PLAN
IMPLEMENTATION COSTS
PAGE ONE

Implementation of the necessary work to accomplish the Closure of the Technicare Hazardous Waste Facility should commence around spring of 1987. Since it will take approximately 180 days to obtain approval of the Closure Plan itself, and because it will take some time to organize the plan and mobilize the forces to perform the work it is not likely that the work will commence any sooner.

Therefore, this Closure Plan, again assuming "worst" conditions, shall assume that the actual Technicare forces are at a minimum and ALL work will be performed by outside forces. However, the Plan assumes that The Facilities Manager will still be an employee of The Technicare Corporation.

For expediency and cost effectiveness the organization of the total work force should appear as follows:

- 1> INDEPENDENT REGISTERED ENGINEER - As called for by Ohio EPA for inspections and CERTIFICATIONS
- 2> TESTING LABORATORIES - For testing and analysis
- 3> CONSTRUCTION RELATED WORK - Work, such as excavation, Tank removal, sewer installation, backfill, concrete work, paving, etc.
- 4> EPA APPROVED HAULERS, CARRIERS, TRUCKERS, ETC. - For removing and disposing of Spills, disposing of contaminated soils and/or materials, removal of liquid effluents, etc.

Along with the cost of these Contractors, this Plan also will include in the "Estimate for Closure Costs" labor costs to dispose of the last volumes of Hazardous Waste that is received at the Hazardous Waste Facility. Even though this item of work may appear to be part of the "every day" work duties, because of the current layoff policies, knowledgeable labor may not always be available. Since the requirements call for a time period of 90 days to remove and dispose of these materials it appears wise to include an estimate of cost for this work and include this cost in the Closure Plan Estimate.

Again, referring to the itemized breakdown of disciplines as listed above, and assuming the "worst" conditions, as outlined in the "Schedule of Events", Exhibit 6, this Plan will still recommend the most cost effective way of subletting this work.

<1> INDEPENDENT REGISTERED ENGINEER - As per Ohio EPA

Referring, again to Exhibit 6, the following outlines the work items required by Ohio EPA, for an Independent Registered Engineer. Among these work items is the necessary inspections of tests and Certifications of Closure of the portions of the work and Certification of the Final Closure. The time frames listed below should also account for necessary phone calls, reports, and incidentals necessary for a complete job.

FACILITY CLOSURE PLAN
IMPLEMENTATION COSTS
PAGE TWO

WORK EVENT	DAYS
Inspection of tests for soils, effluents Explosion Proof Addition, and Ground Water (worst condition - twice)	6
Inspect and Certify Decontamination of Explosion Proof Addition	3
Inspection of excavation and backfill of Underground Tank Removal Operation	7
Inspection of site tests and recommendations	3
Inspection of finished job and Certification of Closure of Facility	5
TOTAL DAYS REQUIRED FOR REGISTERED ENGINEER	24

<2> TESTING LABORATORY - Approved by Technicare and Ohio EPA

Referring to Closure Operations, Sections A to E, and assuming "worst" conditions, as stated above, the following indicates the maximum number of tests and the type of tests required to complete the Closure.

TYPE OF TEST	OCCURRENCE OF TEST	NUMBER REQUIRED
Walls, floor and Ceilings (2 times)	After Decontamination of of Explosion Proof Addition	4
Tank Effluent	After Decontamination of of Explosion Proof Addition	4
Ground Water	Commencement of Operations	1
Soil Test	Commencement of Operation	4
Soil Test	After Results of first tests	2
Pavement Surface Tests	After Removal of Tank	4
Samples of 55 Gal. Drums	During Hazardous Waste Removal	10
TOTAL NUMBER OF SAMPLES		29

FACILITY CLOSURE PLAN
IMPLEMENTATION COSTS
PAGE THREE

<3> CONSTRUCTION RELATED WORK

This section will represent the Engineer's Estimate for the work described below. These costs will be backed by actual quotations.

ITEM OF WORK	QUANTITY	UNIT	EXTENSION
Decontaminate Explosion Proof Room	32 hrs.	35/hr	\$ 1,120
Rental of Steam Generator	2 days	200/day	400
Purchase Painters Uniforms	2 each	100/ea	200
Remove Wood Partitions	16 hrs.	35/hr	560
Excavate for Tank	200 cy.	5/cy	1,000
Remove Sewer & Vent	8 hrs	35/hr	280
Remove Tank	lump sum		1,000
Backfill Tank	200 cy.	15/cy	3,000
Pave Area	700 sf.	2.50/sf	1,750
Hose Down & Flush Area	8 hrs	35/hr	280
TOTAL ESTIMATE FOR CONSTRUCTION WORK			\$ 9,590

<4> EPA HAULERS, TRUCKERS, CARRIERS, ETC.

The following will be a list of events that is represents the "worst" conditions regarding hauling away decontaminated or hazardous materials during the Closure Operations and also includes hauling away 55 gallon drums of hazardous waste generated by manufacturing. The costs of these events is an estimate and will be backed by actual quotations.

FACILITY CLOSURE PLAN
IMPLEMENTATION COSTS
PAGE FOUR

EVENT	QUANTITY	UNIT	EXTENSION
Dispose of Tank Effluent	3 times	1,200/ea	3,600
Dispose of Contaminated Soil. 200 cy/18 cy per Truck Load = 12 loads; Times 120 miles	1,440 mi	3.50/mi	5,040
Dispose of 55 gal Drums	60 ea.	150/ea	9,000
Dispose of Tank	1 each	500/ea	500
Dispose of Spills, Effluent from Cleaning Equipment, Etc.	6 each	500/ea	3,000
TOTAL ESTIMATED COST FOR HAULERS, ETC.			\$ 21,140

SUMMARY OF ESTIMATED COSTS

REGISTERED ENGINEER	24x8x65	\$ 12,480
TESTING LAB	29X500	14,500
CONSTRUCTION WORK		9,590
HAULERS, ETC.		21,140
Total Estimated Cost		\$ 57,710
CONTINGENCY @ 10 %		5,771
TOTAL ESTIMATED COST		\$ 63,481

**** EXHIBIT EIGHT ****

**FACILITY CLOSURE PLAN
DESCRIPTION OF TESTS
PAGE ONE**

The Testing Laboratory performing the testing for this project shall assure the highest degree of accuracy and precision in the laboratory's analytical results. In addition, the laboratory shall assure both validity and integrity of all samples taken to the laboratory through adherence to proper sample collection and documentation procedures.

All samples submitted to the laboratory shall be documented. Prior to formal acceptance into the laboratory the condition of the sample and all accompanying documents shall be examined and recorded or logged. Any sample and/or documentation discrepancies (broken or leaking sample container, broken sample seal, incomplete or questionable sample labels, chain-of-custody records, analytical request) shall be resolved before the sample is approved and actually accepted for analysis.

TESTING METHODS

The analytical methods that are referenced below and are to be used in the determination of the contamination levels of samples can be found in:

Test Methods for Evaluating Hazardous Wastes

SW-846 (2nd Edition)

The compounds to be determined along with the applicable methods are listed below. These are based on the hazardous wastes generated by the Technicare Corporation as found in Exhibit-3 of this Plan:

ORGANIC METHODS

Modified Method 8240 (GC/MS)

Acetone	1,1,1, Trichloroethane
Methylene Chloride	Alcohols**
Methyl ethyl ketone	Acetates**

**Although not found on the 8240 compound list, but can be determined using the same general method.

Method 8270 (GC/MS)

Cresols
Cresylic Acid

**** EXHIBIT EIGHT ****

**FACILITY CLOSURE PLAN
DESCRIPTION OF TESTS
PAGE TWO**

METAL METHODS

Method 7080 - Barium
method 7190 - Chromium
Method 7210 - Copper
Method 7380 - Iron
Method 7420 - Lead

Method 6020*** (ICP)

Barium
Chromium
Copper
Iron
Lead

***This method may be used in place of the 7000 series methods listed previously.

MISCELLANEOUS METHODS

Method 1010 - Flash Point
Method 9040 - pH
Method 9065 - Phenolics

Detection test limits for all methods will vary depending upon the matrix.

The laboratory performing the analyses shall use SW-846 methods as described above. The laboratory also must show that it has a quality assurance/quality control plan for each parameter required by the Plan. QA/QC procedures should be similar to that in the Ohio EPA/Ohio Department of Health's "RCRA Laboratory Quality Assurance Project Plan" (1983). Submittal of a full QA/QC plan is not required, but evidence of such a program must be presented to show that the laboratory has a complete QA/QC program for SW-846 methods.

TEST DETECTION AND SAFE LIMITS

The areas of contamination of this project shall be subdivided into two groups. Simply, rinseates and soil.

**** EXHIBIT EIGHT ****

**FACILITY CLOSURE PLAN
DESCRIPTION OF TESTS
PAGE THREE**

RINSEATES

- 1> Samples taken in the Explosion Proof Room shall be considered rinseates.
- 2> Samples taken of the effluent in the underground tank shall be considered rinseates.
- 3> Samples taken on the exterior pavement shall be considered rinseates.
- 4> Samples of any 55 gal. drum shall be considered rinseates.

Analytical testing limits for rinseates shall be less than 1 mg/liter.

"Clean" limits for rinseates shall be 1 mg/liter.

Analytical testing laboratories shall show through their QA/QC plan that the testing limits can be achieved and shall highlight any samples that exceed the "clean" limits.

SOILS AND GROUND WATER

As described in the Plan, background tests shall be taken and levels of these tests shall be determined. If background levels are below detection limits for the compounds listed in the Plan then "CLEAN" shall be five to ten times the detection limit.*****

However, if compounds are detected in the background samples a formula shall be established to pinpoint a level that is in effect equal to that of the background sample plus 1 mg/liter. This level shall then be the "SAFE" level for any of the other samples taken at the required areas as described in the plan.*****

*****The factor of 5 to 10 times detection limits shall be a guide for bidding purposes. The actual factors shall be determined by Ohio EPA, The Professional Engineer, and The Testing Laboratory. In many cases the "formula" may not be abstract but empirical and again the limits shall be determined by Ohio EPA, The Professional Engineer, and The Testing Laboratory.

December 3, 1986

Mr. Thomas Copeland
Manager of Facilities
The Technicare Corporation
29100 Aurora Road
Solon, Ohio

RE: Hazardous Waste Facility Closure
Quotation for Consulting Engineering Services

Dear Tom:

The following is our quotation for consulting engineering as described in the specifications known as "The Technicare Corporation Hazardous Waste Facility Closure Plan", prepared by Cuyahoga Consulting Engineering Services.

The quotation is based on an hourly rate, not to exceed a price which reflects the "worst conditions".

QUOTATION

We will provide a Registered Professional Engineer to inspect, advise, certify, and assist in the several operations as outlined in the plan, in order to complete the ultimate decontamination of the Waste Facility.

As described by the plan, CERTIFICATIONS will occur for the following:

- 1> Decontamination of the Explosion Proof Room
- 2> Underground tank removal or abandonment
- 3> Exterior site/FINAL CERTIFICATION

INSPECTIONS of tests conducted on the site will occur each and every time a test is made on the site as outlined in Exhibit 7, TESTING LABORATORY.

Complete INSPECTIONS will be made at all occurrences of excavations and backfills and all related work in the decontamination or disposal of hazardous materials.

Mr. Thomas Copeland
The Technicare Corporation
Quotation
December 3, 1986
Page Two

All other items and incidentals required will be performed to complete the job as described by the "Plan".

REPORTS will be submitted upon each visit, consultation, inspections, and certifications.

The cost to perform this work shall be based on an hourly rate plus direct costs of materials, copies, etc. The total cost shall not exceed the hours required to perform the work for the "worst" conditions.

HOURLY RATE: Registered Engineer \$ 50.00 per hour
HOURLY RATE: Secretarial Service \$ 25.00 per hour
MATERIALS, ETC.: Direct Costs

Our estimate of cost for the "worst conditions" which also represents our Guaranteed Maximum Price is as follows:


Engineering	170 hrs. at \$ 50/hr.	\$ 8,500
Secretarial	17 hrs. at 25/hr.	425
Materials, copies, etc.		575

TOTAL GUARANTEED MAXIMUM PRICE \$ 9,500

Billings will occur monthly for the actual work performed.
We hope this meets with your approval.

Sincerely,

CUYAHOGA ENGINEERING SERVICES



Carl P. Gulla, Jr., PE
Registration No. 30968

proposal

VELOTTA PAVING COMPANY

33141 Bainbridge Road
 SOLON, OHIO 44139
 (216) 349-2908

PROPOSAL SUBMITTED TO Cuyahoga Engineering Services		PHONE	DATE November 25, 1986
STREET 6556 Maplewood Drive		JOB NAME Hazardous Waste Facility-Techincare	
CITY, STATE AND ZIP CODE Mayfield Hts., Ohio 44124		JOB LOCATION Asphalt Patch	
ARCHITECT	DATE OF PLANS	Attn: Carl Gulla	JOB PHONE 953-7140

We hereby submit specifications and estimates for:

To patch approx. 700 sq. ft. using 2" of #404 asphaltic concrete wearing course.
 Area will be compacted with a 3-5 ton roller.

All work will be done in strict accordance with Cuyahoga Engineering Service.

We Propose hereby to furnish material and labor — complete in accordance with above specifications, for the sum of:

One thousand, Seven hundred fifty dollars----- dollars (\$ **1,750.00**).

Payment to be made as follows:

FULL PAYMENT UPON COMPLETION

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alteration or deviation from above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance. Contractors are fully covered by Workmen's Compensation Insurance.

Authorized
Signature

Michael J. Velotta

Note: This proposal may be withdrawn by us if not accepted within **30** days.

Acceptance of Proposal — The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Date of Acceptance: _____

Signature

Michael J. Velotta

Signature



**WADSWORTH/ALERT
LABORATORIES, INC.**

Sampling, testing,
consulting, mobile labs

5405 East Schaaf Rd. / P.O. Box 31454 / Cleveland, Ohio 44131 / (216) 642-9151

Nov. 24, 1986

HEADQUARTERS AND
LABORATORY
1600 Fourth Street, S.E.
P.O. Box 208
Canton, OH 44701
(216) 454-5809

LABORATORY
2121 Fourth Street, S.E.
Canton, OH 44701
(216) 454-1703

SOUTHEASTERN
REGIONAL OFFICE
744 Sunset Boulevard
West Columbia, SC 29169
(803) 794-6251

REGIONAL
LABORATORY
Route 3 - Box 235
Bartow, FL 33830
(813) 533-2150
(Shipping address)
Avenue D North
Bartow Municipal Airport
Bartow, FL 33830

24-Hour ALERT line
3) 454-8304

In Ohio Call:
800-544-5588

Carl P. Gulla, Jr., P.E.
Cuyahoga Engineering Services
6556 Mayfield Drive
Mayfield Heights, OH 44124

Dear Mr. Gulla:

Attached is our proposal for the analysis of various samples collected during the Technicare Corporation Hazardous Waste Facility closure.

Our proposal is based on the analysis of those compounds found on "The Chemicals to be Tested" list provided to me. Our pricing is based on analyzing approximately thirty six (36) samples as listed in Exhibit 7 of the closure plan.

In response to your request for a definition of the "clean" limits to be used for the soils, I feel this is not practicable until the background levels are determined. If background levels are below detection limits for those compounds in question, then "clean" may be five - ten times the detection limit. However, if some compounds are detected in the background samples, then five - ten times, may be too high.

I've also enclosed a Quality Assurance statement that will help answer some of the questions EPA may have regarding the Q.A./Q.C. for the project. If you have any questions, or need additional information, please do not hesitate to contact me.

Sincerely yours,

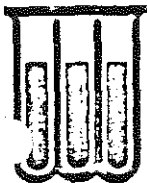
WADSWORTH/ALERT LABORATORIES, INC.

Robert E. George
Technical Director & General Manager

sd

cc: Dr. Marvin Stephens
John Laliberte



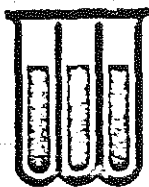


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LABORATORIES, INC.

Wadsworth/ALERT Laboratories, Inc., proposes to furnish the analytical capabilities needed to complete the Testing Laboratory function outlined in The Technicare Corporation Hazardous Waste Facility Closure Plan. All work will be performed by Wadsworth/ALERT Laboratories in its Canton, Ohio facilities. This facility is under the direction of Dr. Marvin Stephens, Vice-President and Technical Director.

The compounds to be determined along with applicable methods are found in Table I. These are based on the hazardous wastes generated by the Technicare Corporation as found in Exhibit 3 of The Plan.

Should it become necessary to determine whether or not contaminated soil can be disposed of in a hazardous waste landfill, we will use the Toxicity Characteristic Leaching Procedure (TCLP) as listed in 40 CFR Part 268 Appendix I.



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TABLE I

Analytical Methods* and Compounds

Organic Methods

Modified Method 8240 (GC/MS)

Acetone
Methylene Chloride
Methyl ethyl ketone

1,1,1, Trichloroethane
Alcohols**
Acetates**

**Not found on the 8240 compound list, but these can be determined using the same general method.

Method 8270 (GC/MS)

Cresols
Cresylic Acid

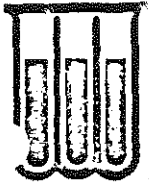
Metals Methods

Method 7080 - Barium
Method 7190 - Chromium
Method 7210 - Copper
Method 7380 - Iron
Method 7420 - Lead

Method 6010*** (ICP)

Barium
Chromium
Copper
Iron
Lead

***This method may be used in place of the 7000 series methods listed previously.



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Miscellaneous Methods

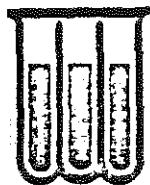
Method 1010 Flash Point

Method 9040 - pH

Method 9065 - Phenolics

Detection limits for all methods will vary depending upon the matrix.

*Methods can be found in SW-846 (2nd Edition) - Test Methods for
Evaluating Hazardous Wastes



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Pricing

Method 8240	\$225.00
Method 8270	250.00
Method 6010	65.00
Method 9065	30.00
Ignitability	25.00
Corrosivity	10.00

The above prices are based on analyzing thirty six (36) samples for each of the above methods. This is the worst case estimate since all samples may not require all analyses.

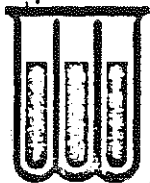
TCLP Prices

Zero Headspace Extraction Procedure	\$135.00
Metals, Semi-volatile Extraction Procedure	90.00
Volatile Organic Analysis	180.00
Semi-organic Analysis	250.00
Metals Analysis	13.00/metal

Consulting Time	\$ 75.00/hour
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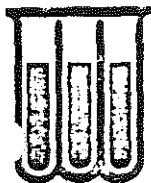
Field Sampling (two man minimum)

Chemical Technician	\$ 35.00/man
Mileage	0.30/mile
Disposable Equipment	35.00/day
Protective Equipment	35.00/man



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QUALITY ASSURANCE
STATEMENT



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TABLE OF CONTENTS

Section I	Laboratory Objectives and Policies
Section II	Laboratory Sample Submittal Procedures
Section III	Laboratory Sample Acceptance Procedures
Section IV	Laboratory Documentation
Section V	Laboratory Analytical Results
Section VI	Quality Control Procedures



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SECTION I

LABORATORY OBJECTIVES AND POLICIES



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OBJECTIVES AND POLICIES

The objective of the Laboratory Quality Assurance Program is to assure the highest degree of accuracy and precision in the laboratory's analytical results. In addition, the Quality Assurance Program is designed to assure both the validity and integrity of all samples submitted to the laboratory through adherence to proper sample collection and documentation procedures.

A Laboratory Quality Control Manual has been written in order to assist the laboratory in attaining this goal. All aspects of the QA Program are contained in the QC Manual and adherence to the procedures stated in the manual will assure that the objectives of the QA Program are satisfied.

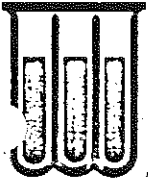
The QC Manual describes the procedures to be followed in order to establish and maintain acceptable accuracy, and precision, and sample integrity for each analytical method used in the laboratory. Also, sample collection, submittal, acceptance, and documentation requirements are described in the QC Manual in order to assure the validity and integrity of samples.



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SECTION II

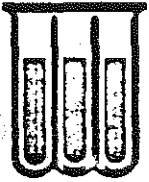
LABORATORY SAMPLE SUBMITTAL PROCEDURES



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LABORATORY SAMPLE SUBMITTAL PROCEDURES

The authorized Sample Custodian will receive and document all sample submittals to the laboratory. The Sample Custodian will examine the condition and accompanying documentation of all submitted samples prior to formal acceptance into the laboratory. This sample examination will be recorded in the Laboratory Sample Log. Any sample and/or documentation discrepancies (broken or leaking sample container, broken sample seal, incomplete or questionable sample labels, chain-of-custody records, analytical request) will be resolved before the sample is approved and actually accepted for analysis. Samples submitted to the laboratory but not approved for analysis due to irreconcilable circumstances will be entered as such in the Laboratory Sample Log.



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SECTION III

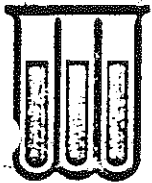
LABORATORY SAMPLE ACCEPTANCE PROCEDURES



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LABORATORY SAMPLE ACCEPTANCE PROCEDURES

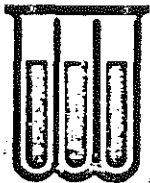
The Sample Custodian will assign a unique laboratory identification number and laboratory sample work card to each approved sample. This numbered sample work card will identify the sample, specify analytical requests, and contain additional laboratory information (date of acceptance, requested completion date, etc.). The sample laboratory identification number, analytical requests, and sample description will also be entered into the Laboratory Sample Log. In addition, the Sample Custodian will file all accompanying sample documentation. The sample will then be assigned to the proper laboratory analyt(s) and placed in the appropriate laboratory sample storage area.



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SECTION IV

LABORATORY DOCUMENTATION



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LABORATORY DOCUMENTATION

Proper Laboratory Documentation measures will be utilized to ensure complete integrity and legal validity of all sample analytical results. These documentation measures will include both sampling (as appropriate) and analytical activities to create a traceable, legal history of each sample.

LABORATORY METHOD LOGBOOK

All laboratory analyses are entered into various Laboratory Method Logbooks which categorically record and document the data for each analytical parameter determined by this laboratory. Each analytical parameter and/or activity is assigned a particular Laboratory Method Logbook which records pertinent preparation, extraction, and instrumental data for each sample. This pertinent information includes: laboratory identification number; initial sample volumes or weights; extraction volumes; dilution factors; instrumental values; and laboratory analyst.

LABORATORY INSTRUMENT LOGBOOK

All laboratory analyses requiring analytical instrumentation are recorded in various Laboratory Instrument Logbooks which categorically record and document analytical instrument settings and performance data. These Laboratory Instrument Logbooks record specific sample volumes, instrument parameters, and corresponding performance results for each sample. In addition, separate laboratory Instrument Service Logbooks are assigned to categorically record and document the routine maintenance, repair, adjustment, and service of each instrument.



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CHROMATOGRAPHY DATA

All chromatography data generated during analyses are categorically filed according to client in the Laboratory Chromatography Data File. This Laboratory Chromatography Data File includes labelled, numbered chromatograms with corresponding integrator print-outs and raw data sheets.

GC/MS DATA

All Chromatography data and corresponding quantitation lists generated by the GC/MS Systems are categorically filed according to client in the Laboratory Chromatography Data File. In addition, all GC/MS chromatography data, quantitation lists, and processed data is recorded on magnetic media.

GC/MS INSTRUMENT LOGSHEET

No

WADSWORTH TESTING LABORATORIES / ALERT INC.
GC INSTRUMENT LOGSHEET

[illegible]

**WADSWORTH TESTING LABORATORIES / ALERT INC.
ORGANIC CHARACTERIZATION LOGSHEET**

LAB NUMBER	PROJECT CODE	STATION NO.	SEQUENCE NO.	MO/DD/YR	TIME	STATION LOCATION				
AT LAB MO/DD/YR	AMOUNT RECEIVED	COMMENTS:	SAMPLE MATRIX				PARAMETER			
			AIR	WATER	SEDIMENT	OTHER	VOLATILE	BASE/NEUT	ACID	OTHER

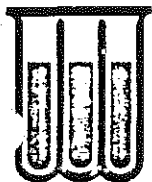
AMOUNT EXTRACTED	INITIAL pH	COMMENTS:								
EXTRACT	ADJUSTED pH	SOLVENT	SOL. VOL. ml	SOL. REC. ml	% REC.	EXCH. SOL.	EXCH. VOL. ml	CONC. ml	DATE	ANALYST
VOLATILE										
BASE/NEUT										
ACID										
OTHER										

INSTRUMENT	VOLATILE			BASE/NEUT			ACID			OTHER		
	DATE	FILE	% SOL/VOL	DATE	FILE	% SOL/VOL	DATE	FILE	% SOL/VOL	DATE	FILE	% SOL/VOL
GC												
GC/MS												
IDENT.	DATE	ANALYST		DATE	ANALYST		DATE	ANALYST		DATE	ANALYST	
QUANT.	DATE	ANALYST		DATE	ANALYST		DATE	ANALYST		DATE	ANALYST	

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SECTION V

LABORATORY ANALYTICAL RESULTS



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LABORATORY ANALYTICAL RESULTS

All laboratory analytical results will be screened and reviewed by the particular laboratory analyst(s) and the laboratory director prior to report generation and distribution to the client. This duplicate analytical review by both laboratory staff and management will objectively monitor all generated data to ensure valid, meaningful analytical results.

ANALYST REVIEW

The laboratory analyst(s) will record all analytical results as generated in the appropriate Laboratory Method Logbook(s). The laboratory analyst(s) will then examine the analysis to ensure that associated quality control samples are within acceptable analytical method control limits. Results outside of these analytical method control limits will require the appropriate corrective action (see Section VII - General Analytical Quality Control Procedures). Analytical results within acceptable method control limits will be recorded on the appropriate Laboratory Sample Work Card and submitted to the Laboratory Director upon completion.

LABORATORY DIRECTOR REVIEW

The Laboratory Director will examine and approve all completed Laboratory Sample Work Cards prior to report generation and distribution to the client. The Director will confirm that the original sample analytical requests have been completely satisfied and examine the analytical results for any inconsistencies or discrepancies. Incomplete Sample Work Card(s) and/or questionable analytical result(s) will require the director to resubmit the sample(s) for analysis and/or re-evaluate original raw analytical and quality control data. The Laboratory Director will have the ultimate authority in determining the proper corrective action for questionable results.



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SECTION VI

QUALITY CONTROL PROCEDURES



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MATRIX SPIKE AND MATRIX SPIKE DUPLICATE ANALYSIS SOP

Matrix spikes are also to serve as duplicates. Therefore, it is necessary to spike two portions of the sample chosen for spiking.

One matrix spike and matrix spike duplicate (MS/MSD) analysis is to be performed on each group of samples of a similar matrix and concentration level for each case received, or for each 20 samples, whichever is more frequent. A case consists of a finite, usually predetermined number of samples collected over a given time period from a particular site.

The same sample should be used as the MS/MSD for each fraction (VOA, BNA, Pesticide) if sufficient sample is available. If not available, it is permissible to use separate samples to perform the MS/MSD on a per fraction basis.

Individual component recoveries of the matrix spike are calculated using Equation 5.1.

$$\text{Matrix Spike Percent Recovery} = \frac{\text{SSR} - \text{SR}}{\text{SA}} \times 100 \quad \text{Eq. 5.1}$$

where

SSR = Spike Sample Results

SR = Sample Result

SA = Spike Added from spiking mix

Relative Percent Difference (RPD)

The contractor is required to calculate the relative percent difference between



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$$\text{RPD} = \frac{D_1 - D_2}{(D_1 + D_2)/2} \times 100 \quad \text{Eq. 5.2}$$

where

RPD = Relative Percent Difference

D_1 = First Sample Value

D_2 = Second Sample Value (duplicate)

Documentation

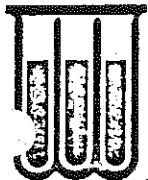
The matrix spike (MS) results (concentrations) for non-spiked HSL compounds shall be reported on Form I (Organic Analysis Data Sheet) and the matrix spike percent recoveries shall be summarized on Form III (MS/MSD Recovery). These values will be used by EPA to periodically update existing performance based QC recovery limits. The results for non-spiked HSL compounds in the matrix spike duplicate (MSD) analysis shall be reported on Form I (Organic Analysis Data Sheet) and the percent recovery and the relative percent difference shall be summarized on form III (MS/MSD Recovery). The RPD data will be used by EPA to evaluate the long term precision of the analytical method. (See Exhibit B, Deliverables, Section III, for complete instructions on the completion of Form III.)



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MATRIX SPIKE RECOVERY CONTROL LIMITS

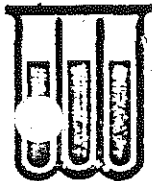
<u>Matrix Spike Compound</u>	<u>Water Recovery Control Limits</u>	<u>Soil Recovery Control Limits</u>
1,1-Dichloroethene	61-145	59-172
Trichloroethene	71-120	62-137
Chlorobenzene	75-130	60-133
Toluene	76-125	59-139
Benzene	76-127	66-142
1,2,4-Trichlorobenzene	39-98	38-107
Acenaphthene	46-118	31-137
2,4-Dinitrotoluene	24-96	28-89
Pyrene	26-127	35-142
N-Nitroso-Di-n-Propylamine	41-116	41-126
1,4-Dichlorobenzene	36-97	28-104
Pentachlorophenol	9-103	17-109
Phenol	12-89	26-90
2-Chlorophenol	27-123	25-102
4-Chloro-3-Methylphenol	23-97	26-103
4-Nitrophenol	10-80	11-114
Lindane	56-123	46-127
Heptachlor	40-131	35-130
Aldrin	40-120	34-132
Dieldrin	52-126	31-134
Endrin	56-121	42-139
4-4' DDT	38-127	23-134



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MATRIX SPIKE RECOVERY LIMITS

<u>Parameter</u>	<u>Water Recovery Control Limits</u>	<u>Soil Recovery Control Limits</u>
PCB	42 - 106	62 - 118
Chloride	97 - 103	96 - 105
Hardness	97 - 101	96 - 102
Sulfate	75 - 115	65 - 125
Magnesium	93 - 109	89 - 113
Potassium	92 - 112	87 - 117
Sodium	84 - 112	77 - 119



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METALS MATRIX SPIKE RECOVERY CONTROL LIMITS

<u>Metal</u>	<u>Water Recovery</u> <u>Control Limits</u>	<u>Soil Recovery</u> <u>Control Limits</u>
Aluminum	97-105	95-107
Arsenic	61-137	42-156
Barium	83-115	75-123
Cadmium	75-115	65-125
Calcium	96-104	94-106
Chromium	73-117	62-128
Copper	82-110	75-117
Iron	93-113	88-118
Lead	62-126	46-142
Magnesium	93-109	89-113
Manganese	88-112	82-118
Mercury	80-120	70-130
Nickel	79-111	71-119
Selenium	50-130	30-150
Silver	84-108	78-115
Sodium	84-112	77-119
Strontium	86-104	94-106
Zinc	84-120	75-129



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SURROGATE SPIKE ANALYSIS SOP

Surrogate Spike (SS) Recovery determinations are completed on all samples requiring GC/MS volatile (VOA) and Base/Neutral Acid (BNA) analyses. Each sample (including matrix spikes and blanks) is spiked with a surrogate standard spiking solution prior to purging or extraction.

The laboratory must take corrective action if the SS recoveries fail to meet the criteria listed below.

- i) All VOA SS recoveries must be in control.
- ii) All BNA SS recoveries must be greater than 10%.
- iii) The recoveries for two of the three SS compounds in each BNA fraction must be in control.



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SURROGATE SPIKE RECOVERY CONTROL LIMITS

<u>Surrogate Compound</u>	<u>Water Recovery Control Limits</u>	<u>Soil Recovery Control Limits</u>
Toluene-d8	88-110	81-117
4-Bromofluorobenzene (BFB)	86-115	74-121
1,2-Dichloroethane-d4	76-114	70-121
Nitrobenzene-d5	35-114	23-120
2-Fluorobiphenyl	43-116	30-115
Terphenyl-d14	33-141	18-137
Phenol-d5	10-940	24-113
2-Fluorophenol	21-100	25-121
2,4,6-Tribromophenol	10-123	19-122

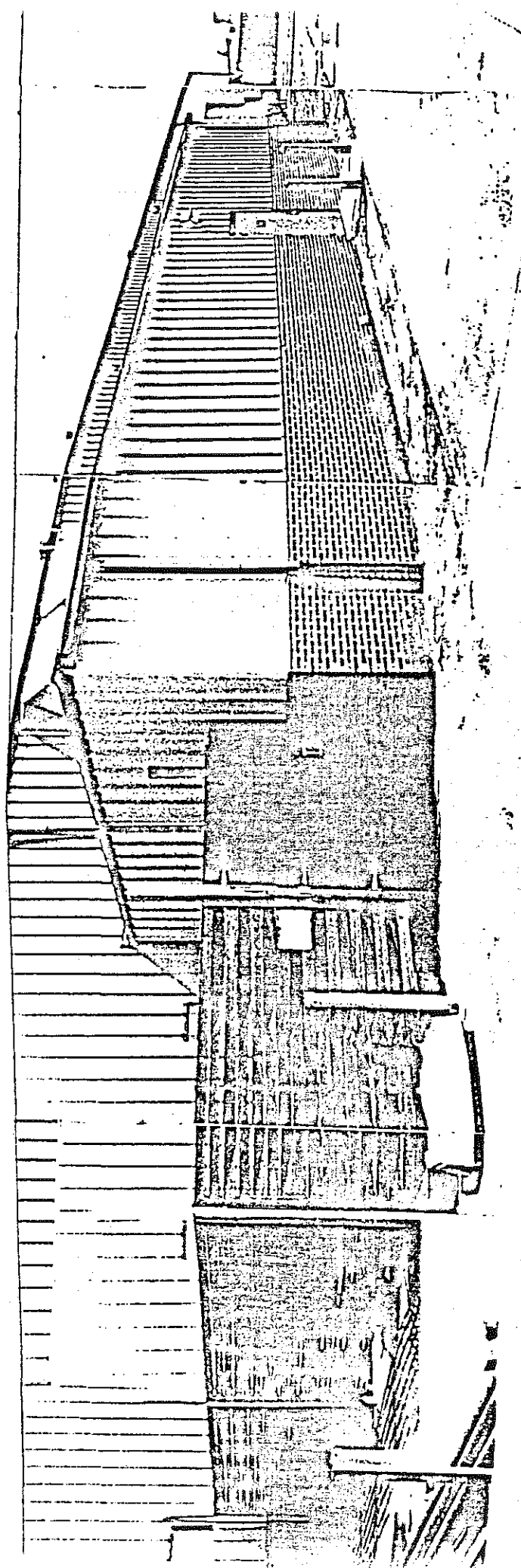


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REAGENT BLANK SOP

A Reagent Blank is to be prepared and analyzed for each day during which samples are prepared for analysis. Normally a Reagent Blank is a volume of laboratory water. However, a purified solid matrix is used as a reagent blank for organic analyses of solids. The Reagents Blank is processed through the entire analytical scheme.

For VOA analyses a Reagent Blank is required every 12 hours.



Technicare Hazardous Waste Facility



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565



Richard F. Celeste, Governor

RE: Technicare Corp.
OHD 055827489

Mr. John C. Wolcott
Vice President-Finance
Johnson & Johnson
One Johnson & Johnson Plaza
New Brunswick, NJ 08933

July 28, 1986

Dear Mr. Wolcott:

I hereby acknowledge the receipt of a 1986 RCRA financial test demonstration update, prepared on behalf of the facility referenced above.

Ohio EPA has completed its review of Technicare Corp.'s financial test submission. In general, Technicare Corp. appears to meet the financial test criteria. However, I have noted a problem that should be corrected or clarified concerning the financial test demonstration. Please clarify or correct the following:

- o Explain why the closure costs for this facility decreased from \$58,200 as reported last year to \$38,500 as reported this year.

Page...2
July 28, 1986

Please submit the corrected information to my attention by August 29, 1986. If you have questions, please contact me at (614) 462-6733.

Sincerely,

Edward A. Kitchen
Surveillance & Enforcement Section
Division of Solid & Hazardous
Waste Management

cc: Dave Sholtis, DSHWM
Karin B. Weikart, Technicare Corp.
Dave Wertz, NEDO

04D 055 827 489
Johnson & Johnson

GUS - DISCARD 1981 ANNUAL
REPORT - TSC

04D 055 827 489

NEW BRUNSWICK, N. J. 08903

April 4, 1983

Regional Administrator
Region V
U.S. Environmental Protection Agency
Waste Management Branch
230 South Dearborn Street
Chicago, Illinois 60604

Attention: RCRA Financial Requirements

Dear Sir:

I am the chief financial officer of JOHNSON & JOHNSON. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. The firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

NONE

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

REGION V

OHIO:

04D 055827489 ✓

TECHNICARE CORPORATION
29100 Aurora Road
Solon, Ohio 44139

✓ \$52,950.00 Closure Estimate

64AR
AUD Q 35

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

REGION I

CONNECTICUT:

CTD 018844050

CRITIKON, INC.
West Green Street
Southington, Connecticut 06489

\$ 7,477.00 Closure Estimate

REGION II

NEW JERSEY:

NJD 05666747

CHICOPEE
Research Division
2 Ford Avenue
Milltown, New Jersey 03850

\$11,655.00 Closure Estimate

NJD 000820142

DEVRO, INC.
Loeser Avenue
Somerville, New Jersey 08876

\$17,000.00 Closure Estimate

NJD 002144145

ETHICON, INC.
Route 22
Bridgewater, New Jersey 08807

\$79,966.00 Closure Estimate

NJT 350D11276

JOHNSON & JOHNSON DENTAL PRODUCTS COMPANY
Pleasant Hill Road
Cranbury, New Jersey 08512

\$25,000.00 Closure Estimate

NJD 000631937

JOHNSON & JOHNSON PRODUCTS, INC.
Eastern Surgical Dressings Plant
Route 1
North Brunswick, New Jersey 08902

\$35,000.00 Closure Estimate

NJD 068715424

ORTHO DIAGNOSTIC SYSTEMS INC.
Route 202
Raritan, New Jersey 08869

\$30,200.00 Closure Estimate

NJD 002144202

ORTHO PHARMACEUTICAL CORPORATION
Route 202
Raritan, New Jersey 08869

\$ 9,052.00 Closure Estimate

PUERTO RICO:

PRD-980536049

JANSSEN, INC.
P.O. Box JPH
Gurabo, Puerto Rico 00658

\$78,000.00 Closure Estimate

REGION III

PENNSYLVANIA:

PAD 000650770

EXTRACORPOREAL MEDICAL SPECIALTIES, INC.
Route 363
Norristown, Pennsylvania 19403

\$21,200.00

REGION V

ILLINOIS:

✓ ILD 010300531

ETHICON, INC.
5001 West 67th Street
Bedford Park, Illinois 60638

✓ \$27,000.00 Closure Estimate

✓ ILD 001799949

JOHNSON & JOHNSON PRODUCTS, INC.
Midwestern Surgical Dressings Plant
4949 West 65th Street
Bedford Park, Illinois 60638

✓ \$200,000.00 Closure Estimate

REGION VI

TEXAS:

TXD 002560233

ETHICON, INC.
3348 Pulliam Road
San Angelo, Texas 76905

\$ 4,000.00 Closure Estimate

REGION IX

CALIFORNIA:

CAD 098228372

ORTHO DIAGNOSTIC SYSTEMS INC.
17392 Daimler Street
Irvine, California 92714

\$13,500.00 Closure Estimate

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms.

The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

NONE

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Sunday closest to December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited year-end financial statements for the completed fiscal year, ended January 2, 1983.

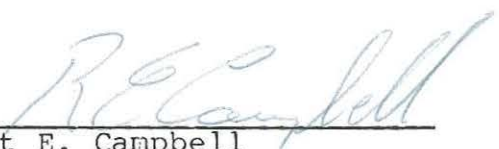
ALTERNATIVE I

	<u>\$ in Millions</u>
1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) <u>\$612,000</u>	<u>\$.6</u>
*2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4) _____	<u>1,410.1</u>
*3. Tangible net worth _____	<u>2,737.3</u>
*4. Net worth _____	<u>2,799.5</u>
*5. Current assets _____	<u>2,253.1</u>
*6. Current liabilities _____	<u>900.2</u>
7. Net working capital (line 5 minus line 6) _____	<u>1,352.9</u>
*8. The sum of net income plus depreciation, depletion, and amortization _____	<u>699.6 (A)</u>
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) _____	<u>2,501.6</u>

	<u>Yes</u>	<u>No</u>
10. Is line 3 at least \$10 million? _____	<u>X</u>	
11. Is line 3 at least 6 times line 1? _____	<u>X</u>	
12. Is line 7 at least 6 times line 1? _____	<u>X</u>	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14. _____		<u>X</u>
14. Is line 9 at least 6 times line 1? _____	<u>X</u>	
15. Is line 2 divided by line 4 less than 2.0? _____	<u>X</u>	
16. Is line 8 divided by line 2 greater than 0.1? _____	<u>X</u>	
17. Is line 5 divided by line 6 greater than 1.5? _____	<u>X</u>	

(A) Excludes an extraordinary charge of \$50 million after taxes associated with the withdrawal of TYLENOL Capsules.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



Robert E. Campbell
Vice-President, Finance

Date: April 4, 1983

Johnson & Johnson

OFFICE OF
GENERAL COUNSEL

NEW BRUNSWICK, N. J. 08933

April 4, 1983

Regional Administrator
REGION V
U.S. ENVIRONMENTAL PROTECTION AGENCY
Waste Management Branch
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
APR 11 1983
**WASTE MANAGEMENT
BRANCH**

Attention: RCRA Financial Requirements

Dear Sir:

JOHNSON & JOHNSON and its subsidiaries have elected to satisfy the financial assurance provisions of 40 CFR 265.143 by using the financial test and corporate guarantee for closure of §265.143(e). The following documents are enclosed to meet the annual reporting requirements of §265.143(e)(5) for the TECHNICARE CORPORATION facility in Solon, Ohio. TECHNICARE CORPORATION is a wholly-owned subsidiary of JOHNSON & JOHNSON.

1. A letter worded as specified in §264.151(f) and signed by Robert E. Campbell, Vice-President, Finance, and chief financial officer for JOHNSON & JOHNSON. This letter not only lists facilities within your jurisdiction, but all other facilities for which JOHNSON & JOHNSON is the guarantor under §265.143(e).
2. Audited consolidated financial statements of JOHNSON & JOHNSON and subsidiaries for 1982 (year ending January 2, 1983). See pages 34 - 45 of enclosed JOHNSON & JOHNSON 1982 Annual Report.

REGION V, USEPA
Chicago, Illinois 60604
RCRA Financial Assurance

April 4, 1983

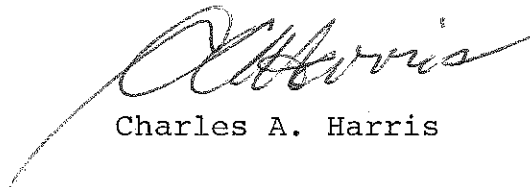
3. A copy of April 4, 1983, "Special Report" of Auditor (independent certified public accountant).

A certificate of insurance also is enclosed to meet the liability requirements of 40 CFR 265.147 for the facilities located in your region or state which now is authorized to administer the regulation. This certificate is worded as specified in §264.151(j).

Should you have any questions, please direct them to me at the address shown below. My telephone number is

(201) 524-5766.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "CHARRIS", is written over a horizontal line.

Charles A. Harris

LFK:dal

Enclosures (4)

One Johnson & Johnson Plaza
Room 3162
New Brunswick, New Jersey 08933-7002

To the Board of Directors
of Johnson & Johnson:

We have examined the consolidated financial statements of Johnson & Johnson and subsidiaries for the year ended January 2, 1983 and have issued our report thereon dated February 16, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have compared the information presented on lines two through nine and thirteen of the schedule of RCRA financial requirement designated as Alternative I in the letter from Robert E. Campbell, dated April 4, 1983, with the amounts in the aforementioned financial statements. Because this procedure does not constitute an examination in accordance with generally accepted auditing standards, we do not express an opinion on any of the items referred to above. In connection with this procedure, no matters have come to our attention which would cause us to believe that such information should be adjusted. This report relates only to the information specified and does not extend to the financial statements taken as a whole. Our report is made solely for the purpose of complying with Environmental Protection Agency regulations and is not to be used for any other purpose.

Coopers & Lybrand

Newark, New Jersey
April 4, 1983

Johnson & Johnson

OFFICE OF
GENERAL COUNSEL

NEW BRUNSWICK, N. J. 08903

July 15, 1982

Regional Administrator
REGION V
U.S. ENVIRONMENTAL PROTECTION AGENCY
Waste Management Branch
230 South Dearborn Street
Chicago, Illinois 60604

Attention: RCRA Financial Requirements

Dear Sir:

JOHNSON & JOHNSON and its subsidiaries have elected to satisfy the financial assurance provisions of 40 CFR 265.143 by using the financial test and corporate guarantee for closure of §265.143(e). The following documents are enclosed to meet the requirements of §265.143(e):

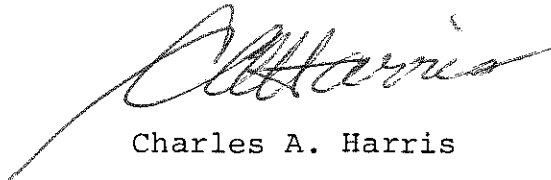
1. A letter worded as specified in §264.51(f) and signed by Robert E. Campbell, Vice-President, Finance, and Chief financial officer for JOHNSON & JOHNSON. This letter not only lists facilities within your jurisdiction, but all other facilities for which JOHNSON & JOHNSON will be the guarantor under §265.143(e).
2. Audited consolidated financial statements of JOHNSON & JOHNSON and subsidiaries for 1981 (year ending January 3, 1982). See pages 32 - 41 of enclosed JOHNSON & JOHNSON 1981 Annual Report.
3. July 15, 1982, "Special Report" of Auditor (independent certified public accountant).
4. Corporate Guarantee or Guarantees for closure or post-closure care worded as specified in §264.51(h) for facilities located in your region or state which now is authorized to administer the regulation.

July 15, 1982

A certificate of insurance also is enclosed to meet the liability requirements of 40 CFR 265.147 for the facilities located in your region or state which now is authorized to administer the regulation. This certificate is worded as specified in §264.151(j).

Should you have any questions, please direct them to me at the address shown below. My telephone number is (201) 524-9333.

Very sincerely yours,

A handwritten signature in cursive script, appearing to read "CHarris", with a long horizontal flourish extending to the left.

Charles A. Harris

CAH:dal

Enclosures (4)



NEW BRUNSWICK, N. J. 08903

July 15, 1982

Regional Administrator
REGION V
U.S. ENVIRONMENTAL PROTECTION AGENCY
Waste Management Branch
230 South Dearborn Street
Chicago, Illinois 60604

Attention: RCRA Financial Requirements

Dear Sir:

I am the chief financial officer of JOHNSON & JOHNSON. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. The firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

NONE

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

REGION II

NEW JERSEY:

NJD 05666747

CHICOPEE
Research Division
2 Ford Avenue
Milltown, New Jersey 08850

\$11,000.00 Closure Estimate

NJD 000820142

DEVRO, INC.
Loeser Avenue
Somerville, New Jersey 08876

\$15,000.00 Closure Estimate

NJD 002144145

ETHICON, INC.
Route 22
Bridgewater, New Jersey 08807

\$74,734.00 Closure Estimate

NJT 350D11276

JOHNSON & JOHNSON DENTAL PRODUCTS COMPANY
Pleasant Hill Road
Cranbury, New Jersey 08512

\$75,000.00 Closure Estimate

NJD 000631937

JOHNSON & JOHNSON PRODUCTS, INC.
Eastern Surgical Dressings Plant
Route 1
North Brunswick, New Jersey 08902

\$100,000.00 Closure Estimate

NJD 087618518

JOHNSON & JOHNSON PRODUCTS, INC.
Research Center
Route 1
North Brunswick, New Jersey 08902

\$40,000.00 Closure Estimate

NJD 068715424

ORTHO DIAGNOSTIC SYSTEMS INC.
Route 202
Raritan, New Jersey 08869

\$25,000.00 Closure Estimate

NJD 002144202

ORTHO PHARMACEUTICAL CORPORATION
Route 202
Raritan, New Jersey 08869

\$ 8,905.00 Closure Estimate

PUERTO RICO:

PRT 000019604

JANSSEN, INC.
P.O. Box JPH
Gurabo, Puerto Rico 00658

\$17,110.00 Closure Estimate

REGION V

OHIO:

OHD 055827489

TECHNICARE CORPORATION
29100 Aurora Road
Solon, Ohio 44139

\$50,000.00 Closure Estimate

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

REGION IV

GEORGIA:

GAD 000614347

ETHICON, INC.
570 Clarkesville Highway
Cornelia, Georgia 30531

\$400,000.00 Closure Estimate

REGION V

ILLINOIS:

ILD 010300531

ETHICON, INC.
5001 West 67th Street
Bedford Park, Illinois 60638

\$25,000.00 Closure Estimate

ILD 001799949

JOHNSON & JOHNSON PRODUCTS, INC.
Midwestern Surgical Dressings Plant
4949 West 65th Street
Bedford Park, Illinois 60638

\$200,000.00 Closure Estimate

REGION VI

TEXAS:

TXD 002560233

ETHICON, INC.
3348 Tulligan Road
San Angelo, Texas 76905

\$ 8,000.00 Closure Estimate

REGION IX

CALIFORNIA:

CAD 098228372

ORTHO DIAGNOSTIC SYSTEMS INC.
17392 Daimler Street
Irvine, California 92714

\$12,000.00 Closure Estimate

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

NONE

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Sunday closest to December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited year-end financial statements for the latest completed fiscal year, ended January 3, 1982.

ALTERNATIVE I

	<u>\$ in Millions</u>
1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) <u>\$1,061,749</u>	<u>\$ 1.1</u>
*2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4) _____	<u>1,292.5</u>
*3. Tangible net worth _____	<u>2,508.5</u>
*4. Net worth _____	<u>2,527.9</u>
*5. Current assets _____	<u>2,202.2</u>
*6. Current liabilities _____	<u>881.2</u>
7. Net working capital (line 5 minus line 6) _____	<u>1,321.0</u>
*8. The sum of net income plus depreciation, depletion, and amortization _____	<u>620.0</u>
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) _____	<u>2,185.2</u>

	Yes	No
10. Is line 3 at least \$10 million? _____	<u>X</u>	
11. Is line 3 at least 6 times line 1? _____	<u>X</u>	
12. Is line 7 at least 6 times line 1? _____	<u>X</u>	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14. _____		<u>X</u>
14. Is line 9 at least 6 times line 1? _____	<u>X</u>	
15. Is line 2 divided by line 4 less than 2.0? _____	<u>X</u>	
16. Is line 8 divided by line 2 greater than 0.1? _____	<u>X</u>	
17. Is line 5 divided by line 6 greater than 1.5? _____	<u>X</u>	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

A handwritten signature in blue ink, appearing to read "R. E. Campbell", is written over a horizontal line.

Robert E. Campbell
Vice-President, Finance

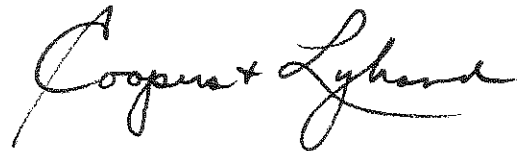
Date: July 15, 1982

To the Board of Directors
of Johnson & Johnson:

We have examined the consolidated financial statements of Johnson & Johnson and subsidiaries for the fifty-three weeks ended January 3, 1982 and have issued our report thereon dated February 17, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have compared the information presented on lines two through nine and thirteen of the schedule of RCRA financial requirements designated as Alternative I in the letter from Robert E. Campbell, dated July 15, 1982, with the amounts in the aforementioned financial statements. In connection with this procedure, no matters have come to our attention which would cause us to believe that such information should be adjusted.

Newark, New Jersey
July 15, 1982

A handwritten signature in cursive script, reading "Coopers & Lybrand".

CORPORATE GUARANTEE FOR CLOSURE OR POST-CLOSURE CARE

Guarantee made this 15th day of July, 1982 by JOHNSON & JOHNSON, a business corporation organized under the laws of the State of New Jersey, herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary, TECHNICARE CORPORATION (herein referred to as "TECHNICARE") of 29100 Aurora Road, Solon, Ohio 44139.

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
2. TECHNICARE owns or operates the following hazardous waste management facility covered by this guarantee:

REGION V

OHIO:

OHD 055827489 (Closure Guarantee)

TECHNICARE CORPORATION
29100 Aurora Road
Solon, Ohio 44139

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.
4. For value received from TECHNICARE, guarantor guarantees to EPA that in the event that TECHNICARE fails to perform closure of the above facility in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of TECHNICARE in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send

within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facility is located and to TECHNICARE that he intends to provide alternate financial assurances as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of TECHNICARE. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless TECHNICARE has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of TECHNICARE unless TECHNICARE has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.
9. Guarantor agrees to remain bound under this guarantee for so long as TECHNICARE must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrator for the Region in which the facility is located and to TECHNICARE, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and TECHNICARE, as evidenced by the return receipts.
10. Guarantor agrees that if TECHNICARE fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of TECHNICARE.

11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by TECHNICARE. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.

Effective Date: July 15, 1982

JOHNSON & JOHNSON

ATTEST:

WJ Ryan
William J. Ryan
Secretary

BY:

RE Campbell
Robert E. Campbell
Vice-President, Finance

STATE OF NEW JERSEY)

) SS.:

COUNTY OF MIDDLESEX)

BE IT REMEMBERED, that on July 15, 1982, before me, the subscriber, a Notary Public of the State of New Jersey, personally appeared William J. Ryan who, being by me duly sworn on his oath, deposes and makes proof to my satisfaction, that he is the Secretary of JOHNSON & JOHNSON, the Corporation named in the within Instrument; that Robert E. Campbell is a Vice-President of said Corporation; that the execution, as well as the making of this Instrument, has been duly authorized by a proper resolution of the Board of Directors of the said Corporation; that deponent well knows the corporate seal of said Corporation; and that the seal affixed to said Instrument is the proper corporate seal and was thereto affixed and said Instrument signed and delivered by said Vice-President as and for the voluntary act and deed of said Corporation, in presence of deponent, who thereupon subscribed his name thereto as attesting witness.



William J. Ryan

Subscribed and sworn to before me at New Brunswick, New Jersey, the day and year aforesaid.



Notary Public of New Jersey

JANET T. MASTANDINO
A Notary Public of New Jersey
My Commission Expires April 4, 1987

Hazardous Waste Facility Certificate of Pollution Liability Insurance

1. American Motorists Insurance Company, (the "Insurer"), of 5 World Trade Center, New York, New York 10048 hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to JOHNSON & JOHNSON, (the "insured"), of New Brunswick, New Jersey in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

Location Name

Address

EPA I.D. #

See Attached

for sudden accidental occurrences

The limits of liability are \$1,000,000. each occurrence
\$2,000,000. aggregate

exclusive of legal defense costs. The coverage is provided under policy number 1YM 578 950A, issued on 1/1/82. The effective date of said policy is 1/1/82.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or involency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of authorized representative of Insurer

J. J. Tcwey

Division Underwriting Officer

REGION V

<u>Name of Facility</u>	<u>Location</u>	<u>EPA Identification Number</u>
TECHNICARE CORPORATION	29100 Aurora Road Solon, Ohio 44139	OHD 055827489 ✓

**C.2 Compliance/
Enforcement**

29 JUNE 1987 1:30 P.M.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

IIWFAD #02-18-0223

U.S. EPA I.D. # OHIO-P55-827-489

GENERAL INFORMATION

Facility: TECHNICARE CORP. Address: 29100 AURORA ROAD City: SOLON
State: OHIO Zip Code: 44139 County: CUYAHOGA Telephone: (216) 248-1800

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>TOM COPELAND</u>	<u>FACILITY MGR.</u>	<u>(216) 248-1800</u>
2.	<u>CARL GULLA</u>	<u>CONSULTANT</u>	<u>(216) 473-6807</u>
3.			

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>MARK BERGMAN</u>	<u>OHIO EPA</u>	<u>(216) 425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- ☒ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03
- ☐ Land Treatment D01
- ☐ Landfills D00
- ☐ Chemical/Physical/Biological 104
- ☐ Groundwater Monitoring
- ☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-----------------|
| 1. Has the facility submitted a Part A to Ohio? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. If "yes", is it complete and accurate? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 3. Has the facility submitted a Part B? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4. Was advance notice of the inspection given? If so, how far in advance? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>2 WEEKS</u> |

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Was primarily a manufacturer of medical diagnostic imaging equipment. Generated solvents, flammables, corrosives, beryllium dust and lead sludge dust. The facility has been closed for more than one year. All manufacturing equipment has been removed as have all drummed hazardous wastes. Revised closure plans are currently being reviewed by the Ohio EPA. A cement underground tank is being included in the closure, because drainage from the storage area ended up here.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)) [3745-65-01]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NO WASTES REMAIN ON-SITE
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

5. The generator meets the following hazardous waste pre-transport requirements:

- a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]
- b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].
- c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:

- a) The containers are clearly marked with the words "Hazardous Waste".
- b) The date that accumulation began is clearly marked on each container.

8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]

9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].

Yes	No	N/A	Remark #
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

11/14/84

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

— — X —

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

X — — —

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

— — X —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

— — X —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility, has -

a) A 24-hour surveillance system, or

X — — —

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

X — — —

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

— — X —

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	—	—	X	—
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	—	—	X	—
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	—	—	X	—
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	—	—	X	—
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	—	—	X	—
b) Physical separation of incompatible waste materials.	—	—	X	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	—	—	X	—
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b), [3745-65-17(B)]	—	—	X	—

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	POSSIBLY A LEAKY CEMENT TANK IS ADDRESSED IN CLOSURE PLAN
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Portable fire control equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. — — X —
 - b) Arrangements or agreements with local or state emergency authorities. — — X —
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. — — X —
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. — — X —
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] — — X —
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] — — X —
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] — — X —
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] — — X —
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] — — X —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—
—	—	X	—

RCRA INTERIM STATUS INSPECTION FORM

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]

Yes No N/A Remark #

— — X —

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]

— — — —

a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]

— — — —

b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]

— — — —

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]

— — — —

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]

— — — —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|-------------------------------------|---|---|-------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | <input checked="" type="checkbox"/> | — | — | _____ |
| a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)] | <input checked="" type="checkbox"/> | — | — | _____ |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input checked="" type="checkbox"/> | — | — | _____ |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | <input checked="" type="checkbox"/> | — | — | _____ |
| d) A description of steps taken to decontaminate facility equipment. | <input checked="" type="checkbox"/> | — | — | _____ |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | <input checked="" type="checkbox"/> | — | — | _____ |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | <input checked="" type="checkbox"/> | — | — | _____ |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | <input checked="" type="checkbox"/> | — | — | _____ |

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]
 - a) A closure trust fund, or
 - b) A surety bond, or
 - c) A closure letter of credit, or
 - d) A combination of financial mechanisms. (FINANCIAL TEST)
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?
3. When was the most recent estimate made?
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?
5. When was the most recent estimate made?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	X	—	—
—	X	—	—
—	X	—	—
X	—	—	—
X	—	—	\$63,481.00
X	—	—	MARCH 1987
—	—	X	—
—	—	X	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	—	—	X	—
b) In good physical condition (265.171) [3745-66-71]	—	—	X	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	—	—	X	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	—	—	X	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	—	—	X	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	—	—	X	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	—	—	X	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	—	—	X	—



State of Ohio Environmental Protection Agency

East District Office
E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171

Richard F. Celeste
Governor

July 20, 1987

RE: TECHNICARE
CUYAHOGA COUNTY
02-18-0223
OHD 055-827-489
GEN/TSD

Tom Copeland
Technicare Corp.
29100 Aurora Road
Solon, Ohio 44139

Dear Mr. Copeland:

On June 29, 1987, I conducted an inspection of the Technicare facility, located at 29100 Aurora Road, in Solon, Ohio. Mr. Carl Gulla and yourself represented the facility. My inspection was conducted to assure that your facility is in compliance with Ohio Hazardous Waste Regulations. Your facility has ceased manufacturing operations and the building is for sale. The building is almost completely empty and all stored hazardous wastes and products have been removed. You are currently awaiting a letter of approval on your closure plan before beginning decontamination. Upon inspection, no concerns or violations were noted. If you need any further assistance you can contact me at (216) 425-9171.

Sincerely,

Mark Bergman, R.S.
Environmental Scientist
Division of Solid and Hazardous Waste
Management

MB/sp

cc: Dave Mentzer, DSHWM, Central Office
Dan Fisher, DSHWM, Central Office

Ohio EPA

Re: Technicare Corporation
#02-18-0223

OHIO 055 827 489

Need further information

STATUS 0

Mr. Mark Tucker
Technicare Corporation
29100 Aurora Road
~~Solon, Ohio 44139~~
Cleveland, Ohio 44139

June 20, 1983

*Need info. report/letter -
original STAT CODE*

Dear Mr. Tucker:

Thank you for your May 20, 1983, reply regarding deficiencies noted during the May 10, 1983, RCRA inspection. Since the information included within your reply adequately alleviates the before mentioned deficiencies, Technicare Corporation now appears to be in general compliance with applicable Ohio Hazardous Waste regulations OAC 3745-50 through 3745-58 and Federal Hazardous Waste regulations 40 CFR 260-265.

Please feel free to contact our office or Mr. James Mayka, U.S. EPA - Region V, at (312) 886-7443, if you have any questions.

Yours truly,



Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office

RB:km

cc: Paula Cotter, DHMM, Central Office
Ken Westlake, U.S. EPA - Region V

RECEIVED
OHIO EPA

JUN 21 1983

DIV. HAZARDOUS
MATERIALS MANAGEMENT

P
Ohio EPA

Re: Technicare Corporation
#02-18-0223

Check
alpha -
TECHNICARE
at given
address

STATUS 3

Mr. Mark Tucker
Technicare Corporation
29100 Aurora Road
Solon, Ohio 44139
Cleveland, Ohio 44139
Dear Mr. Tucker:

OHD 055 827 489

June 2, 1983
G/TSD

On May 13, 1983, I conducted an inspection of the Technicare Corporation facility located at 6000 Cochran Road, Solon, Ohio to determine compliance with both State and Federal hazardous waste regulations. You and Mr. James Bartholomew represented Technicare Corporation during this inspection. A copy of the inspection report is enclosed for your information.

The following deficiencies were noted during this inspection:


1. A written description of the type and amount of both introductory and continuing training is required for all personnel who handle hazardous waste at your facility (40 CFR Part 265.16 (d) and OAC 3745-65-16 (D)).
2. The Contingency Plan should include a list of emergency equipment at the facility including the respective locations, sizes, and capabilities of each (40 CFR 265.52 (e) and 3745-65-52 (E)).

Please forward to my attention a copy of these documents or revisions within the next thirty (30) days.

This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will be forwarded to Mr. James Mayka of the U.S. EPA - Region V.

Please contact our office or Mr. Mayka at (312) 886-7443 if you have any questions.

Yours truly,



Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management

cc: Paula Cotter, DHMM, Central
Office
Ken Westlake, U.S. EPA -
Region V

RB:km

Enclosure

Re: Technicare Corporation
02-18-0223
Cuyahoga County

Mark C. Tucker
Technicare Corporation
29100 Aurora Road
Solon, Ohio 44139

August 11, 1982

Dear Mr. Tucker:

On July 28, 1982, I conducted a hazardous waste inspection at the Technicare Corporation located at 29100 Aurora Road, Solon, Ohio. Mark Tucker and James Bartholomew represented the facility during this inspection. The facility was inspected for compliance with both State and Federal regulations for handling of hazardous wastes.

A copy of this report is enclosed for your information. This report will become part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Kathy Homer of the U.S. EPA - Region V.

Please contact the Ohio EPA or Kathy Homer at (312) 886-7435 if you have any questions.

Yours truly,

Robert E. Buda
Environmental Scientist
Division of Hazardous Materials Management

REB:km

Enclosure

cc: Paula Cotter, DHMM, C.O.
Bob Fragale, HWFAB, C.O.
Kathy Homer, SIP, U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number OH D055827489

HWFAB Permit Number (if appropriate) 02-18-0223

Facility Name TECHNIGARE CORPORATION

Location 29100 AURORA ROAD
SOLON, Ohio 44139

Person(s) Interviewed

Title

Telephone

MARK C. TURNER

INDUSTRIAL SAFETY ENGINEER (216) 248-1800

JAMES A. BARTHOLOMEW

MATERIALS LABORATORY SUPERVISOR (216) 248-1800

Inspector(s)

Agency/Title

Telephone

ROBERT E. BUDA

Ohio EPA Env. Sci.

(216) 425-9171

Ohio EPA

Ohio EPA

Installation Activity

Mark One

☐ Generator only (G)

☐ Transporter only (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☐ Waste Piles S03

☐ Land Treatment D81

☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting

☐ Groundwater Monitoring

☒ Closure and Post-Closure

☒ Financial Requirements

☒ Containers S01

☐ Tanks S02/T01

☒ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment T03

☐ Chemical/Physical/Biological T04

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH D 05582 7489

Facility: TECHNICARE CORPORATION Address: 29100 AURORA ROAD City: SOLON
 State: OHIO Zip Code: 44139 County: CUYAHOGA Telephone: (216) 248-1800
 Facility Operator: MARK TUCKER Title: INDUSTRIAL SAFETY ENGINEER Telephone: (216) 248-1800
 Facility Owner: TECHNICARE CORPORATION Address: 29100 AURORA ROAD
 City: SOLON State: OHIO Zip Code: 44139 Telephone: (216) 248-1800
 Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-18-0223

Date of Inspection: 7-28-82 Time of Inspection: (Start) 1 PM (Finish) 2:30 PM

Advance Notification? ☐ No ☒ Yes: _____

Weather Conditions: SUNNY, WARM

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>MARK C. TUCKER</u>	<u>INDUSTRIAL SAFETY ENGINEER</u>	<u>(216) 248-1800</u>
2.	<u>JAMES A. BARTHOLOMEW</u>	<u>MATERIALS LABORATORY SUPERVISOR</u>	<u>(216) 248-1800</u>
3.	_____	_____	_____
4.	_____	_____	_____

INSPECTOR(S)

(Telephone)

1.	ROBERT E. BUDA	ENVIRONMENTAL SCIENTIST	(216) 425-9171
2.			
3.			
4.			

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F003, F004, F005, K069, P015, D001, D002

b) Non-Listed Wastes: $\frac{\checkmark}{D001} I$ $\frac{\checkmark}{D002} C$ $\frac{\quad}{D003} R$ $\frac{\quad}{D000} T$

3. Has this facility submitted a Part A Permit Application? ✓ Yes No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

 Yes, See Remark # ✓ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____

✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.)

✓ No

a) Applicable U.S. EPA I.D. Number OHIO 055827489

b) Ohio P.U.C.O. GR TRSF Number

7. A brief description of site activity:

MANUFACTURER OF MEDICAL DIAGNOSTIC IMAGING EQUIPMENT

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	spent halogenated and non-halogenated solvents are incinerated as is lead, and benzene dist.
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Simple neutralizing is done for plating rinses before going down the sanitary sewer.
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	none have occurred
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>✓</u>	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	<u>✓</u>	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	_____	_____	<u>✓</u>	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	<u>✓</u>	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>✓</u>	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	_____	_____	<u>✓</u>	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	_____	_____	<u>✓</u>	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u>✓</u>	_____	_____	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u>✓</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.	_____	_____	<u>✓</u>	_____

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) 24-hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	✓	—	—	—
a) Inspect emergency equipment.	✓	—	—	—
b) Inspect monitoring equipment.	✓	—	—	—
c) Inspect security, alarm and communication devices.	✓	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	✓	—	—	—
e) Inspect containment structures (dikes, curbs, etc.).	✓	—	—	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓	—	—	—
g) Inspect hazardous waste handling/loading areas each day used.	✓	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	—	—	✓	<i>none have occurred</i>
i) Record of any hazardous waste discharges.	—	—	✓	<i>none have occurred</i>
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓	—	—	—
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓	—	—	—
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) Physical separation of incompatible waste materials.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u> </u>	<u> </u>	<u>✓</u>	<u>no comingling is done</u>

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).
 - a) Internal alarm system
 - b) Access to telephone, radio or other device for summoning emergency assistance.
 - c) Portable fire control equipment.
 - d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).

_____	✓	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Actions to be taken by personnel in the event of an emergency incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Arrangements or agreements with local or state emergency authorities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Names; addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<u>✓</u>	<u> </u>	<u> </u>	<u>as needed</u>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<u> </u>	<u> </u>	<u>✓</u>	<u>no emergency has occurred</u>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

3. ~~The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).~~
4. ~~An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).~~
5. ~~If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.~~

See 4-5 A

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Yes No N/A Remark #

1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).

✓ _____

✓ _____

✓ _____

✓ _____

✓ _____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark#</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<input checked="" type="checkbox"/>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<input checked="" type="checkbox"/>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<input checked="" type="checkbox"/>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<input checked="" type="checkbox"/>	_____

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:			<input checked="" type="checkbox"/>	
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	<input checked="" type="checkbox"/>	_____

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.

_____ _____ ✓ _____

c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.

_____ _____ ✓ _____

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>will be as required.</i>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	_____	_____	<input checked="" type="checkbox"/>	_____
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	_____	_____	<input checked="" type="checkbox"/>	_____
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	_____	_____	<input checked="" type="checkbox"/>	_____
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	_____	_____	<input checked="" type="checkbox"/>	_____
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	_____	_____	<input checked="" type="checkbox"/>	_____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	_____	_____	<input checked="" type="checkbox"/>	_____
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	_____	_____	<input checked="" type="checkbox"/>	_____
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	_____	_____	<input checked="" type="checkbox"/>	_____
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	_____	_____	<input checked="" type="checkbox"/>	_____

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|---------------|---------------|--------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | <u> </u> | <u> </u> | <u> ✓ </u> | <u> </u> |

Subpart H: Financial Requirements

- | | | | | |
|--|--------------|---------------|---------------|---------------|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | <u> ✓ </u> | <u> </u> | <u> </u> | <u> </u> |
|--|--------------|---------------|---------------|---------------|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Right in an explosion proof building
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

/

5/15/82 2:00

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #12-18-0223

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHDO5827489

Facility: Technicare Corporation Address: 29100 Aurora Road City: Solon

State: Ohio Zip Code: 44139 County: Cuyahoga Telephone: (216) 248-1800

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mark Tucker</u>	<u>Industrial Safety Engineer</u>	<u>(216) 248-1800</u>
2.	<u>James A. Bartholomew</u>	<u>Materials Laboratory Supervisor</u>	<u>(216) 248-1800</u>
3.			

INSPECTOR(S)

1.	<u>Polmer Beals</u>	<u>Environmental Scientist</u>	<u>(216) 425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- | | |
|---|---|
| <input type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input checked="" type="checkbox"/> Containers S01 | <input type="checkbox"/> Land Treatment D81 |
| <input type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Landfills D80 |
| <input type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Groundwater Monitoring |
| | <input type="checkbox"/> Post-Closure |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. If "yes", is it complete and accurate?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. Has the facility submitted a Part B?	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Manufacturer of medical diagnostic imaging equipment.

Notes: F001, F003, F004, F005

K069

P015

D001, D002

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			✓	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			✓	
b) The date that accumulation began is clearly marked on each container.			✓	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	✓			
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).		✓		<u>Description of training</u>

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>guards</u>
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>waste storage area alarm system</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	no comingling

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			fire sprinkler system
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)				
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))			✓	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM SITE INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))

✓			
---	--	--	--
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).

✓			
---	--	--	--
 - c) The estimated (or actual) weight, volume or density of the waste material(s).

✓			
---	--	--	--
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).

✓			
---	--	--	--
 - e) The present physical location of each hazardous waste within the facility.

✓			
---	--	--	--
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))

		✓	
--	--	---	--
 - g) Records of any waste analyses and trial tests required to be performed.

✓			
---	--	--	--
 - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).

✓			
---	--	--	--
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).

✓			
---	--	--	--
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

✓			
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) A description of how and when the facility will be closed. (265.112(a)(1)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<input checked="" type="checkbox"/>			
b) A surety bond, or				
c) A closure letter of credit, or				
d) A combination of financial mechanisms.				

✓ Financial Test

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	—	—	—
b) In good physical condition (265.171)	✓	—	—	—
c) Compatible with the wastes stored in them (265.172)	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	—	—	—
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	—	—	—
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	—	—	—



Re: Application Number 81-HW-0223
Cuyahoga County

August 20, 1981

Mr. Albert Fumich
Manager, Facilities
Technicare Corporation
29100 Aurora Road
Cleveland, Ohio 44139

Dear Mr. Fumich:

On July 23, 1981, Richard Shandross of the U.S. EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Jim Bartholomew.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: ✓ Brenda Lillstrom, U.S. EPA, Region V
Richard Shandross, U.S. EPA, Region V

CERTIFIED MAIL

STATE IDENTIFICATION NUMBER
(If Applicable)

OHD 055827489
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Technicare Corp.
(B) Street: 29100 Aurora Rd.
(C) City: Cleveland (D) State: Ohio (E) Zip Code: 44139
(F) Phone: (216) 248-1800 (G) County: Cuyahoga
(H) Operator: Same as above
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Same as above
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____
(V) Date of Inspection: 7-23-81 (W) Time of Inspection (From) 9:30a (To) 1:35p
(X) Weather Conditions: About 70°F. Clear

7-1-81/J.B.

(Y) Person(s) Interviewed

Title

Telephone

Jim Bartholomew

Supvr. Mails Lab

(216) 248-1800

Al Fumich

Mgr. Facility

(216) 248 1800

Mark Tucker

Indust. Safety Engr

(216) 248 1800

(Z) Inspection Participants

Agency/Title

Telephone

Richard Shandross

USEPA/Env. Engr.

(312) 886-6146

(AA) Preparer Information

Name

Agency/Title

Telephone

Richard Shandross

USEPA/Env. Engr

(312) 886-6146

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

A. Storage and/or Treatment

1. Containers (I)
2. Tanks (J) *(Treat)*
3. Surface Impoundments (K)
4. Waste Piles (L)

B. Land Treatment (M)

C. Landfills (N)

 D. Incineration and/or Thermal Treatment (O and P)

X E. Chemical, Physical, and Biological Treatment (Q)

↑ indicated on Part A as TO4, but was a mistake - should be TO1.

NOTE: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

(see remarks)

*Actual inspection showed it to be a floor trench, not a tank.
RS 2/23/81*

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source?
2. Facility expansion?

—	✓	—	N/A no receipt of offsite waste
—	✓	—	N/A no expansion. they are writing a letter to USEPA re: upgrading.

(B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

✓	—	—	some waste is not analyzed because they know the waste composition from raw materials. this is not indicated in plan 265.3 (b) <table border="1" style="display: inline-table; vertical-align: middle;"> <tr><td>1</td><td>✓</td></tr> <tr><td>2</td><td>✓</td></tr> <tr><td>3</td><td>✓</td></tr> <tr><td>4</td><td>✓</td></tr> </table> <table border="1" style="display: inline-table; vertical-align: middle; margin-left: 10px;"> <tr><td>5</td><td>N/A</td></tr> <tr><td>6</td><td>N/A</td></tr> </table>	1	✓	2	✓	3	✓	4	✓	5	N/A	6	N/A
1	✓														
2	✓														
3	✓														
4	✓														
5	N/A														
6	N/A														
✓	—	—													
—	—	—													
—	—	—	N/A no offsite												

(C) Security - Do security measures include: (if applicable)

1. 24-Hour surveillance?
2. Artificial or natural barrier around facility?
3. Controlled entry?
4. Danger sign(s) at entrance?

—	✓	—	once every 2 hrs.
—	✓	—	
—	✓	—	
✓	—	—	"Restricted area" instead of "Danger"

(D) Do Owner or Operator Inspections Include:

1. Records of malfunctions?
2. Records of operator error?
3. Records of discharges?

—	—	—	N/A
—	—	—	N/A
✓	—	—	

Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	265.15(b) <u>1/1</u> <u>2/1</u> <u>3/1</u> <u>4/1</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A no security devices
7. Operating and structural devices? (OSD)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A currently no OSD for prevention
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	detection response etc (see 265.15(b)(1))
(E) Do personnel training records include:				schedule & log includes planned such equipment, and is not currently in use, however a daily audit for condition of site and containers. no ^{inspector} operator name or date of corrective action
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	according to operator
(F) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See general remarks

IV. PREPAREDNESS AND PREVENTION:

(Part 265 Subpart C)

Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes	No	NI	Remarks
-----	----	----	---------

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?
2. Telephone or 2-way radios at the scene of operations?
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

V

Remarks

Alarm pull box in building by
waste telephone in same

(problem is difficult access
inside of bldg)

- pump for corpses
- absorbent/neutralizing mat
- fire extinguishers

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?
2. Is emergency equipment maintained in operable condition?

✓

☐ [x22aw72356](#)
 ☐ [x22aw72357](#)
 ☒ [x22aw72358](#)

- interval monthly inspection
- annual insp. by outside firm

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

www.elsevier.com/locate/jmb

N/A always more than one person

(E) Is there adequate aisle space for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

Does the Contingency Plan contain the following information:

Yes No NI

Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓ — —

265.56

a	x
b	x
c	x
d	x
e	x
f	x
g	x
h	x
i	x
j	✓

has a document called "proplan for emergency" and one called "evacuation plan"

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

— ✓ —

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

— ✓ —

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓ — —

- capabilities (size) of extinguishers not documented.
- spill equip not doc.

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓ — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	to fire dept. at least
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	not in "contingency plan"
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A no emergencies

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(C) Operating Record

	Yes	No	NI	Remarks
1. Does the owner or operator maintain an operating record as required in 265.73?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	no T, S, D codes RS no
c. The location and quantity of each hazardous waste within the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	no weight, or volume & density
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A not disposal
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OK
f. Reports detailing all incidents that required implementation of the Contingency Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A no incidents
g. All closure and post closure costs as applicable?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	has RS

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI	Remarks
(A) Closure				
1. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is the written closure cost estimate available?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Post closure care and use of property <i>N/A no disposal</i>				
1. Is the facility post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Is the written post-closure cost estimate available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANGEMENT OF CONTAINERS

Facility Name: Technicare Corp Date of Inspection: 7-23-81

	Yes	No	NI	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>very minor rust & dents</i>
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Yes No NI Remarks

5. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).

____ ✓ ____

6. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

____ ____ ____

N/A no incompatible

7. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

____ ____ ____

N/A

J
TANKS

N/A

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

____ ____ ____

3. Do continuous feed systems have a waste-feed cutoff?

____ ____ ____

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

____ ____ ____

5. Are required daily and weekly inspections done?

____ ____ ____

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

____ ____ ____

7. Are incompatible wastes stored in separate tanks?
(If not, the provisions of 40 CFR 265.17(b) apply.)

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	_____	_____	_____	_____
2. Do earthen dikes have protective covers?	_____	_____	_____	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	_____	_____	_____	_____
4. Is the freeboard level inspected at least daily?	_____	_____	_____	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	_____	_____	_____	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____

Yes No NI Remarks

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

L
WASTE PILES

N/A

Facility Name: _____ Date of Inspection: _____

Yes No NI Remarks

1. Are waste piles covered or protected from dispersal by wind?

2. Is each in-coming movement of waste analyzed before being added to the waste pile?

3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? (The effective date of this provision is Nov. 19, 1981.)

4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?

6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)

7. Are piles of incompatible waste protected by barriers or distance from other waste?

*Not Inspected

M
LAND TREATMENT

N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation?	_____	_____	_____	_____
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?	_____	_____	_____	_____
3. Is waste analyzed according to 265.273?	_____	_____	_____	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	_____	_____	_____	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	_____	_____	_____	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	_____	_____	_____	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	_____	_____	_____	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	_____	_____	_____	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)	_____	_____	_____	_____

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

Yes No NI Remarks

(A) General Operating Requirements

Does the facility provide the following:

**1. Diversion of run-on away from active portions of the fill?

**2. Collection of run-off from active portions of the fill?

**3. Is collected run off treated?

4. Control of wind dispersal of hazardous waste?

(**Effective 11-19-81)

(B) Surveying and Recordkeeping

Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell?

2. The contents of each cell and the location of each hazardous waste type within each cell?

(C) Closure and Post-Closure

1. Is the Closure Plan available?

2. Has this plan been submitted to the Regional Administrator?

3. Has closure begun?

4. Is the closure cost estimate available?

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.)

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements.
If not, the provisions of 40 CFR 265.17(b) apply.

	Yes	No	NI	Remarks
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P
INCINERATION and THERMAL TREATMENT

N/A

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

(A) Type of unit (i.e., type of incinerator or thermal treatment): _____

(B) Components and steady state condition:

Was each component at steady state prior to adding waste?

Component	Yes	No	NI	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

(A) Minimum requirements, for wastes not previously burned/treated.

	Yes	No	NI	Remarks
1. Required analyses; has an analysis been performed for the following?				
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

	Yes	No	NI	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	_____	_____	_____	_____
b. Mercury:	_____	_____	_____	_____
(B) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				

Remarks

1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

III. Monitoring and Inspections

	Yes	No	NI	Remarks
(A) Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	_____	_____
(B) Is steady state maintained or corrections attempted?	_____	_____	_____	_____
(C) Is stack plume observed at least hourly for normal color and opacity?	_____	_____	_____	_____
(D) Did any stack observations made by owner or operator show a plume different than normal?**	_____	_____	_____	_____
(E) If yes to D above, were corrections made to return emissions to normal appearance?**	_____	_____	_____	_____
(F) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	_____	_____

**Specify in Remarks for what period of time this was checked.

	Yes	No	NI	Remarks
(u) Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	_____	_____

IV. Open Burning

(A) Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

N/A

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of Generator				
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Did the generator receive a signed copy of each manifest from the designated facility within 35 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI	Remarks
1. If not, was an Exception Report submitted to the Regional Administrator?	—	—	—	—
2. Was the Exception Report submitted within 45 days of the date of the waste was accepted by the initial transporter?	—	—	—	—
(D) If an Exception Report was submitted, did it contain the following information:		N/A		
1. A legible copy of the manifest for which the generator does not have confirmation of delivery?	—	—	—	—
2. A cover letter is signed by the generator or his representative explaining the efforts taken to locate the hazardous waste and the results of those efforts?	—	—	—	—
(E) How many manifests were checked during the inspection?				one of one 2700 gal
(F) Describe the generators system for tracking manifests:				—
				—
				—
				—

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	✓	—	—	cleaning compound (Freon TMS) as "cleaning compound, lig, nos" which is <u>correct</u> , but actual matl is not
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓	—	—	for no NA or UN # for the Freon
(C) If required, are placards available to transporters of hazardous waste?	✓	—	—	—

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections ignitable or reactive waste located at least 15 meters (50 feet) from facility's property line?	_____	_____	_____	_____
4. If waste are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
f. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	_____	_____	_____	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	_____	_____	_____	_____

VIII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI	Remarks
Has the installation imported or exported Hazardous Waste?	_____	_____	_____	_____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste; has a generator:				
a. Notified the Administrator in writing?	_____	_____	_____	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
c. Met the Manifest requirements?	_____	_____	_____	_____
2. Importing Hazardous Waste; has the generator met the manifest requirements?	_____	_____	_____	_____

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM and RECORDKEEPING
(Subpart B)

	Yes	No	NI	Remarks
Are copies of the completed manifests of shipping paper(s) available for review and retained for three years?	___	___	___	

II. INTERNATIONAL SHIPMENTS

	Yes	No	NI	Remarks
(A) Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	
(B) Are signed completed manifest(s) on file?	___	___	___	

V. MISCELLANEOUS

	Yes	No	NI	Remarks
(A) Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	
(B) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	

NOTE: If (A) or (B) were answered "Yes" then the transporter is also a Generator and must comply with the Generator regulations.

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Company makes medical equipment. The only wastes which are not shipped off-site are chemical conversion coating mild acids and bases which are ~~neutralized~~ neutralized together in a floor drain (to sewer). Because the drain is not designed for accumulation, I interpret it to not be a tank. On the other hand, the mixing does constitute pre-treatment.

Due to the ~~my~~ simplicity and directness of the system, I failed to realize that, if the process cannot be called "totally enclosed" as per 260.10(a), then it fits into the TO4 definition. In defining the process the operators had referred to tanks (meaning the generating tanks) so my inspection of the area consisted of confirming that the process didn't take place in a tank and thus shouldn't be defined by TO1 after all.

As to the "totally enclosed" -ness of the operation: the drain is covered only by a grill, but discharge from the two generating tanks can be controlled to prevent overflow. Water constantly flows through the open drain as overflow from a nurse tank. The operation is not continuous, but occurs in batches. The length of the drain is about 15'-25'.

One final factor: the operators referred to the tanks' (2 of them) contents as hazardous waste, although they also said at another time that the corrosives are very mild. They may not even be hazardous at all, then, ~~because~~

the plant property, thus exposing it to ^{potential} skidding cars, hot
exhaust, etc.; coupled with lack of security and danger warning.

RCRA INSPECTION REPORT

INTERIM STATUS STANDARDS, TREATMENT, STORAGE AND DISPOSAL FACILITIES

DEFICIENCY NOTIFICATION TABLE

ISS INSPECTION

FACILITY NO. - 81 - NW - 0223

OWNER -

FACILITY NAME - Technical Corp.

FACILITY LOCATION - 29100 Aurora Road, Cleveland, Ohio 44139

FACILITY CONTACT - Albert Fumich, Mgr Facilities

ISS INSPECTION DATE - 7/23/81

PHONE NO. - (216) 248-1808

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13		✓	
	2	3745-55-13	265.13		✓	
	3	"	"			
	C 1	3745-55-14	265.14	B	✓	
	2	"	"	B		
	3	"	"	B		
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"	B		
	3	"	"	B	✓	
5	IV A	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"	B	✓	
	3	"	"	B	✓	
	C 1	3745-55-33	265.33			
	2	"	"	?		
	D	3745-55-34	265.34			
	E	3745-55-35	265.35			
6	V A 1	3745-55-52	265.52			

COLUMN I

COLUMN II

COLUMN III

COLUMN IV

COLUMN V

COLUMN VI

Item No.

OAC Reference

USEPA Reference

See Code
FollowingRefer To
ISS RemarkOEPA
Use

Page

6 (Con't.)	V	A	2	3745-55-52	265.52	B		
			3	"	"	B		
			4	"	"		✓	
			5	"	"			
7		B		3745-55-53	265.53			
		C	1	3745-55-55	265.55	B		
			2	"	"			
			3	"	"			
		D		3745-55-56	"			
	VI	A	1	3745-55-71	265.71			
			2	"	"			
		B		3745-55-72	265.72			
8		C	1	3745-55-73	265.73			
			2b	"	"			
			c	"	"			
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"	B		
9	VII	A	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142			
		B	1	3745-56-09	265.118			
			2	"	"			
			3	"	"			
			4	3745-56-34	265.143			
	VIII	I	1	3745-56-51	265.171			
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"			
10			5	3745-56-54	265.174	B		
			6	3745-56-56	265.176			
			7	3745-56-57	265.177			
		J	1	3745-56-72	265.192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265.193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
11			7	3745-56-79	265.199			
			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
12			7	3745-57-11	265.230			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer to ISS Remark	OEPA USE
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3	3745-57-33	265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
		2	"	"		
	C	1	3745-56-03	265.112		
		2	"	"		
		3	"	"		
		4	3745-56-32	265.192		
	D		3745-57-82	265.312		
			3745-55-17	265.17(b)		
			3745-57-83	265.313		
15	E		3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
		2	"	"		
		3	"	"		
		4	"	"		
	G		3745-57-85	265.315		
16	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	
	II	A	1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
17		2a	3745-58-35	265.375		
		b	"	"		
	B	1	"	"		
		2	"	"		
		3	"	"		
		4	"	"		
		5	"	"		

Page	COLUMN I Item No.		COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer to ISS Remark	COLUMN VI OEPA USE
17 (Con't)	III	A	3745-58-37	265.377			
		B	"	"			
		C	"	"			
		D	"	"			
		E	"	"			
		F	"	"			
		G	"	"			
	IV	A 1	3745-58-42	265.382			
		2	"	"			
19	Q	1	3745-58-51	265.401			
		2	"	"			
		3	3745-58-52	265.402			
		4	3745-58-53	265.403			
		5	3745-58-55	265.405			
		6	3745-58-56	265.406			
20 IX	I	(A)	3745-52-40	262.40			
		(B) 1	3745-52-21	262.21			
		2	"	"			
		3	"	"			
		4	"	"			
		5	"	"			
		6	"	"			
		7	"	"			
		8	3745-50-42	122.6			
		(C)	3745-52-42	262.42			
21		1	3745-52-42	"			
		2	"	"			
		(D) 1	3745-52-42	262.42			
		2	"	"			
	2	(A)	3745-52-30	262.30			
		(B)	3745-52-31	262.31			
		(C)	3745-52-33	262.33			
22	3	1	3745-52-34	262.34			
		2	"	"			
		3	3745-56-54	265.174			
		4a	3745-56-72	265.192			
		b	"	"			
		c	"	"			
		d	3745-56-74	265.184			
		e	3745-56-78	265.198			
		f	3745-56-79	265.199			
23	VI	A	3745-52-40	262.40			
		B	3745-52-41	262.41			
	VII	1a	3745-52-50	262.50			
		b	"	"			
		c	"	"			
		2	"	"			
24 X	I		3745-53-22	263.22			
	II	A	3745-53-20	263.20			
		B	"	"			
	V	A	3745-53-10	263.10			
		B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

**D. Corrective
Action**

Determination: Groundwater sampling**PA/VSI Or RFA FILE REVIEW CHECKLIST**

Facility Name: Technicare Corp (Nestle Graphic Service)_____

EPA ID: OHD 055 827 489_____ City: Solon_____ State: OH_____

Name of Reviewer: Maureen McHugh_____ Date of Review: 7/28/08_____

1	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Is this a one folder site?
2	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there Superfund files for this site?
3	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you Read the Executive Summary?
			There are: <u> 10 </u> SWMUs and <u> 1 </u> AOCs at this site.
4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you review the regulatory history?
5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Does the facility have interim status or a permit?
			This facility is a: <u> </u> SQG, <u> </u> LQG, or <u> </u> Less than 90 day.
6	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was the Facility closed per RCRA? RCRAInfo 380 (1987)
			If Yes, was the closure: <u> X </u> CC, or <u> </u> CIP.
7	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there documented (historical) releases? Briefly describe on Page 2.
8	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

 No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

 X Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

 More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and PAHs discovered in the soil and groundwater near the USTs during closure. The tank and a contaminated soil were removed and disposed of off site. The soil was tested clean following removal under closure of the SWMUs. There is no documentation on the remediation of the groundwater, and no sampling available to assess the extent of the contamination.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

PA/VSI Recommendations

Sampling the groundwater at SWMU2. Groundwater is used as a source of drinking water. Nearest well is 2 miles down gradient of the facility.

Spoke with Harry Courtright and he said that this site has a 'B' ranking. It has a more information needed- low priority. There is no known contamination and the site has yet to be engaged by OEPA CA.

Dave Sholtis: Although OEPA has no evidence of a release at the facility, OEPA does not have enough information to say that NFA is needed.

NESTLÉ PRINT GRAPHICS

PHONE 216-349-5757

FAX 216-349-3580

February 25, 1993

Mr. Kevin M. Pierard
MN/OH Technical Enforcement Section
RCRA Enforcement Branch
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

RECEIVED
MAR 03 1993

OFFICE OF RCRA
WASTE MANAGEMENT
EPA REGION V

RECEIVED MAY 27 1993
WMD RCRA
RECORD CENTER Compliance

Re: Visual Site Inspection
Nestlé Print Graphic Service Division (Formerly Technicare Corporation) Solon, Ohio
ID No. OHD 055 827 489

Mr. Pierard,

We are writing in response to your report dated January 25, 1993, regarding a PA/VSI conducted at our Print Graphics Service Division on July 16, 1992.

After further discussion with the Solon City Fire Marshall we found that the Area of Concern (AOC) mentioned in the report, is a concrete separator. According to the Fire Marshall, it was installed as a non-regulated tank and does not fall under the Bureau of Underground Storage Tank Regulations (BUSTR) in Ohio. Drawings of the site reveal that the separator drains into a 24" storm sewer.

As recommended by the PRC Environmental contractors, we have capped the drain/manhole in the concrete pad leading to the separator. Our next step will be to retain a contractor to drain the separator, clean it and close it in place by filling it with sand and capping it. The Fire Marshall will be inspecting the site as work progresses.

Please advise us in writing by March 15, 1993 (we are planning it shortly after this date) if this plan of action will satisfy the concerns raised in the PA/VSI report.

If there are any other actions you feel we need to take, your suggestions will be appreciated.

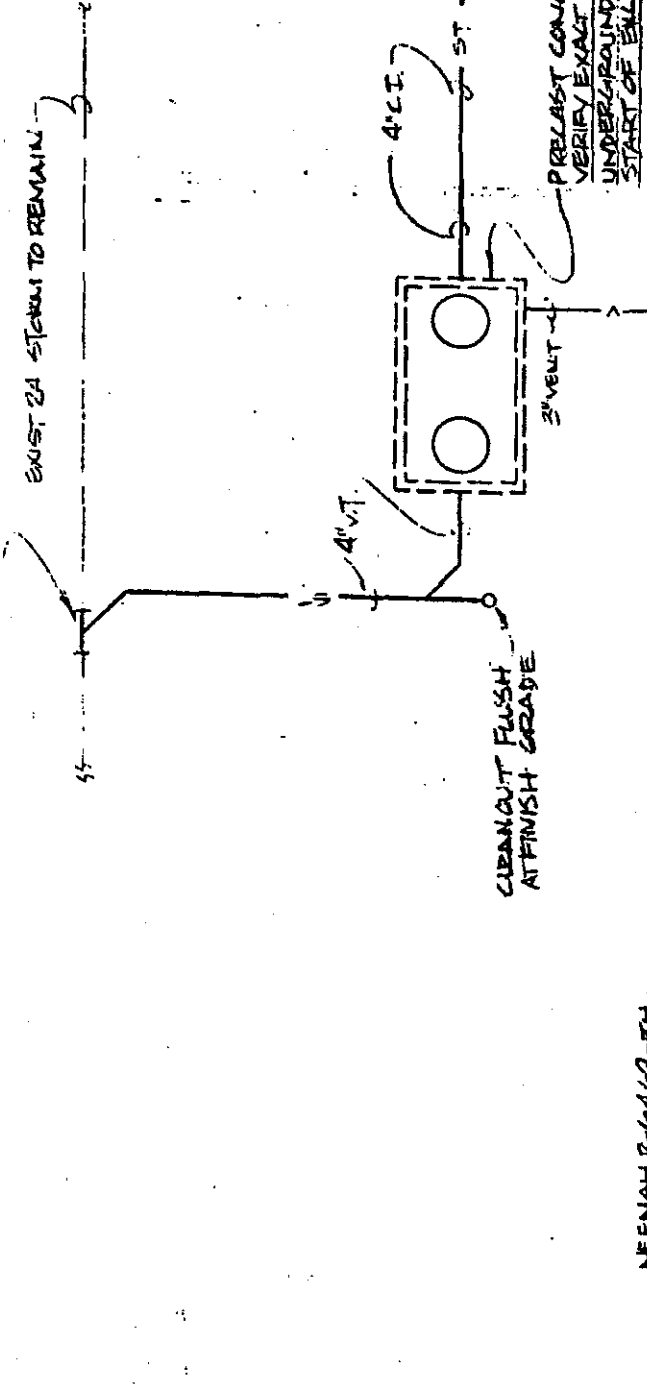
Sincerely,

Richard Artino

Richard Artino, CSP
Manager, Safety and
Industrial Hygiene

cc: David Sholtis, Ohio EPA

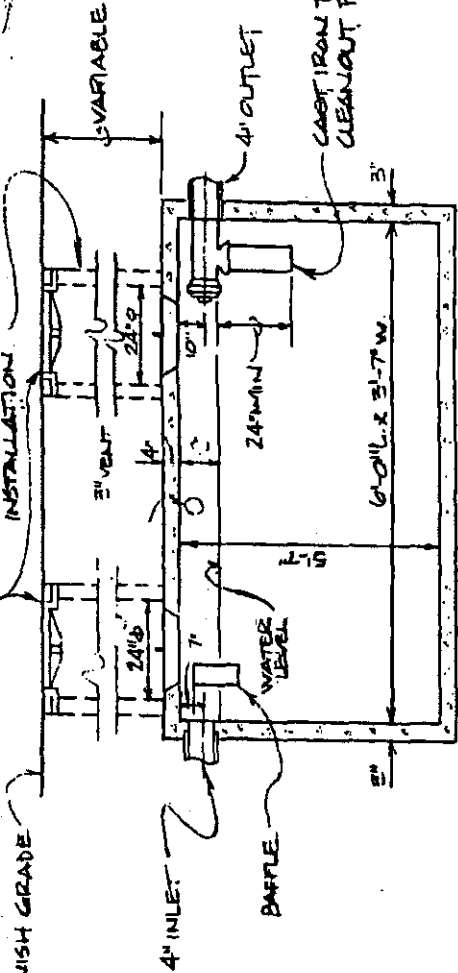
EXIST 24" STORM TO REMAIN



NEENAH R-6462-ET
CAST-IRON FRAME &
CAP OR EQUIV.

FINISH GRADE

PRECAST CONCRETE RISER
FOR SUB-SURFACE
INSTALLATION



3" VENT TO ABOVE ROOF SCHEDULE 40
CHLV. STL. WITH REIN. CAST IRON FITTINGS.

PRECAST CONCRETE SEPARATOR
VERIFY EXACT LOCATION TO AVOID ANY
UNDERGROUND UTILITIES BEFORE
START OF EXCAVATION. - SEE 15-740

MECHANICAL
1/4"
OUTSIDE FINISH

500 GALLON PRECAST CONCRETE SEPARATOR DETAIL

NOT TO SCALE

FLAMMABLE LIQUID HOLDING TANK SAME EXCEPT NO
OUTLET & ONLY ONE ACCESS MANHOLE TO INLET



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RCRA
RECORD CENTER
JAN 26 1993
PA/VSI

REPLY TO THE ATTENTION OF:

HRE-8J

January 25, 1993

Mr. Frank Calia
Pressco Technology, Inc.
29200 Aurora Road
Cleveland, Ohio 44139-1847

Re: Visual Site Inspection
Nestle Print Graphic Service Division
(Formerly Technicare Corporation)
Solon, OH
ID No. OHD 055 827 489

Dear Mr. Calia:

As indicated in the letter of introduction sent to you on June 23, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

TECHNICARE CORPORATION

**SOLON, OHIO
OHD 055 827 489**

RELEASED
DATE 11/01/01
RIN #
INITIALS sh

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 055 827 489
Date Prepared	:	October 21, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH6J
Prepared by	:	PRC Environmental Management, Inc. (John Maher)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

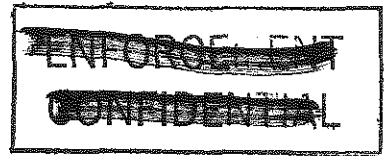
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2	FACILITY LAYOUT	9

RELEASED
DATE 11/01/01
RIN #
INITIALS



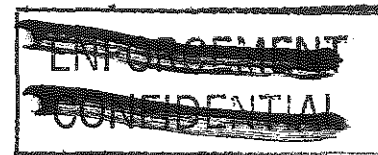
EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the facility formerly known as Technicare Corporation in Solon, Cuyahoga County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

Technicare Corporation (Technicare) began manufacturing medical diagnostic imaging equipment at this facility in March 1973. (For clarity, this report uses, "Technicare" to refer to the company that occupied this site, and "facility" to refer to the property and buildings previously occupied by Technicare and currently occupied by 11 companies.) The facility was sold to Weston, Inc. (Weston), in April 1986, though Technicare continued to occupy the site until the complete removal of equipment by mid to late 1987. The five buildings previously occupied by Technicare are now occupied by eleven companies unrelated to Technicare. These companies are as follows: Victoreen, Inc. (Victoreen); Nestle Print Graphic Service Division (Nestle); Pressco Technology, Inc. (Pressco); Weston; Picker International; The Society of Explosive Engineers; Hubcor Trade Journal Publishing Co.; Kelly Services; State Representative Mike Weiss; Stargate; and Innovative Imaging. All of these companies lease from Weston, except Nestle, which owns the property it occupies. Of these eleven companies, the first three have their own EPA identification numbers (OHD 982 424 970, OHD 986 982 643, and OHD 987 009 396, respectively). Technicare and these three facilities are the focus of this report.

The following table lists the waste streams generated by companies occupying the facility and the waste streams generated by Technicare when it was operating:

<u>Generating Company</u>	<u>Description and waste code</u>
Technicare	Ignitable solvents (D001, F003, and F005), halogenated solvents (F001), lead-contaminated emission control dust (K069), beryllium (P015), spent corrosive (D002), and an unidentified waste (F004)
Victoreen	Spent freon (F001), spent methanol (F003), spent acetone (F003), spent corrosives (D002), dry paint filters (nonhazardous), and waste oil (nonhazardous)



<u>Generating Company</u>	<u>Description and waste code</u>
Nestle	Unusable ink (D001), spent roller wash (D001), alcohol-water mixture (nonhazardous), and silver-contaminated waste water (nonhazardous), and solvent- and ink-contaminated rags
Pressco	Spent solvent (D001 and F003) and parts washer waste water (nonhazardous)

Victoreen and Nestle have been operating at this location since 1987. Pressco has occupied building B since November 1990. The regulatory status of the companies occupying the site follows: Victoreen is a small-quantity generator (SQG); Nestle is a conditionally exempt small-quantity generator (CESQG); and Pressco is a CESQG, but will soon be a non-handler. All other companies operating at this location are not regulated by the Resource Conservation and Recovery Act (RCRA). Technicare was a large-quantity generator and a container storage facility. This container storage unit, now known as the Explosion Proof Addition (Container Accumulation Unit) (SWMU 1), is located on the south side of building C, now occupied by Victoreen. Formal RCRA closure of the container storage unit, the container storage unit's secondary containment tank, and an empty drum storage area was completed in December 1987. The Explosion Proof Addition (Container Accumulation Unit) (SWMU 1) is used for less than 90 day accumulation of containers of hazardous waste.

The facility occupies approximately 43 acres in an industrial and commercial area. This property, previously owned and occupied by Technicare, is now owned by two companies: building H is owned and operated by Nestle; all other buildings, identified as buildings A, B, C, and N, are owned by Weston and leased to the companies currently occupying them.

The PA/VSI identified the following ten SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Explosion Proof Addition (Container Accumulation Area) (Technicare and Victoreen)
2. Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (Technicare)
3. Empty Drum Storage Area (Technicare)
4. Satellite Accumulation Area (Victoreen)
5. Pretreatment Lime Crock (Technicare)
6. Sewer System (Technicare, Victoreen, Nestle, and Pressco)
7. Hazardous Waste Accumulation Area (Nestle)
8. Bins for Solvent- and Ink-Contaminated Rags (numerous) (Nestle)
9. Silver Recovery Units (3) (Nestle)
10. Hazardous Waste Accumulation Area (Pressco)

Areas of Concern

1. Outdoor Flammable Liquid Storage Unit Drainage System

A release from the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2) to adjacent soil and groundwater was discovered in 1986. The constituents of the release included 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons. RCRA closure of the Explosion Proof Addition (Container Storage Unit) (SWMU 1), the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2), and the Empty Drum Storage Area (SWMU 3) was completed December 16, 1987. Details regarding the remediation of on-site soil and ground water are not known.

The potential of a release to the surface water and air from the SWMUs and AOCs at this facility is low. SWMUs that are currently active (SWMUs 1, 4, 6, 7, 8, 9, and 10) all have release controls, and the SWMUs that are no longer active have either been RCRA closed or cleaned.

Though the release to soil and groundwater from SWMU 2 was addressed through the RCRA closure of this unit, no documentation in available files indicates that groundwater affected by the release was remediated. Also, no sample analysis reports are included in the documentation supporting completion of closure.

PRC recommends sampling the monitoring well located near SWMU 2 to determine if ground water is contaminated.

One AOC, the Outdoor Flammable Liquid Storage Unit Drainage System, was observed during the VSI. Documentation supports that a release from this unit probably has not occurred. However, a pipe connects the floor drain in this unit to an on-site ditch. Though the containers stored in this unit are managed properly and are in good condition, there is a potential for a release to the ditch if a drum leaks. AOC 1 is the only unit at the facility with unrestricted access. PRC therefore recommends sealing the floor drain.

The facility occupies 43 acres in an industrial and commercial area in Solon, Ohio. Solon has a population of about 18,548.

The facility is bordered on the north by two vacant office buildings, Mammesmann Demag, Belcan Specialty, and Bows Manufacturing; on the west by Tool-Die Engineering Co.; on

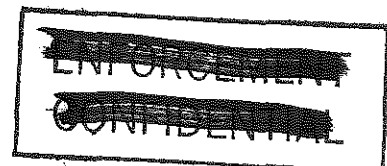
the south by Albany Valve and Fitting; on the east by two high-rise office buildings; and on the northeast by a Sunoco Oil Co. gas station and several industrial warehouses.

All SWMUs at this facility are either located inside buildings or have been RCRA closed and are no longer used for managing wastes. Each building at the facility has controlled access, utilizing security guards or one entrance with a receptionist. Victoreen also utilizes monitoring cameras. No perimeter fence is used anywhere on the facility. AOC 1 is the only accessible unit at the facility.

The nearest surface water body is Tinker Creek, which is approximately 1.3 miles west of the facility. Other surface water bodies in the area include Meadow Lake and Briar Hill Lake, which are greater than 2 miles from the facility.

Ground water is used as a drinking water and industrial water supply. The nearest private drinking water well is located 2.1 miles south and downgradient of the facility (PRC, 1992). The nearest industrial well is located at Lindberg Heat Treating Co., which is approximately 0.1 mile south, southeast of the facility.

No on-site, sensitive environments are indicated on National Wetlands Inventory (NWI) maps reviewed. However, a small, on-site ditch near the west side of the facility appears to be a palustrine wetland. The nearest sensitive environment indicated on the NWI maps is a palustrine wetland located 1/4 mile northeast of the facility.



1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, waste water treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the facility formerly known as Technicare Corporation (Technicare) (EPA Identification No. OHD 055 827 489) in Solon, Cuyahoga County, Ohio. The PA was completed on July 10, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on July 16 and 17, 1992. It included interviews with facility representatives and a walk-through inspection of the facilities. PRC identified ten SWMUs and one AOC at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and 13 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history, environmental setting; and receptors. Figure 1 shows the facility location. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown on Figure 2. The facility's waste streams are summarized in Table 2.

2.1 FACILITY LOCATION

The facility is located at 29000 Aurora Road in Solon, Cuyahoga County, Ohio. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41° 24' 00" N and longitude 81° 28' 00" W). The facility occupies 43 acres in an industrial and commercial area.

The facility is bordered on the north by two vacant office buildings, Mammesmann Demag, Belcan Specialty, and Bows Manufacturing; on the west by Tool-Die Engineering Co.; on the south by Albany Valve and Fitting; on the east by two high-rise office buildings; and on the northeast by a Sunoco Oil Co. gas station and several industrial warehouses.

2.2 FACILITY OPERATIONS

Four companies (Technicare, Victoreen, Nestle, and Pressco) have handled hazardous waste at this site. Technicare, which has not occupied the site since 1987, manufactured medical diagnostic imaging equipment. Technicare occupied all five of the buildings on site, though waste activities appear to have been restricted to building C, and possibly H. Technicare's waste generating activities included a painting operation, a secondary lead smelting operation, and some unknown activities that apparently generated small amounts of hazardous waste (Technicare, 1982). Hazardous waste was stored by Technicare in the Explosion Proof Addition (Container Accumulation Area) (SWMU 1) and the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition¹ (SWMU 2). Technicare also had an area where empty drums were stored (SWMU 3) and a Pretreatment Lime Crock (SWMU 5) that neutralized waste water from a chemical conversion coating operation. Technicare completed RCRA closure of SWMUs 1, 2, and 3 on December 16, 1987. After completion of closure, Technicare no longer engaged in any activities at the facility.

¹Technicare referred to SWMU 2 as the underground concrete tank.

Victoreen currently occupies building C, which they lease from Weston. They manufacture survey instruments, such as dosimeters, for the medical field. Their waste-generating activities include degreasing of circuit boards and cleaning equipment using ignitable solvents. Spent freon is temporarily accumulated in Victoreen's Satellite Accumulation Area (SWMU 4) and all waste, including spent freon, is accumulated for less than 90 days in the Explosion Proof Addition (Container Accumulation Area) (SWMU 1).

Nestle currently owns and occupies building H. Nestle operates a print shop, prints on paper and cardboard using a sheet-fed printing process. Nestle's printing presses utilize stoddard solvent (roller wash), which is periodically disposed. Cleaning the presses also generates solvent-contaminated rags. Also, unusable ink (D001) must be discarded at times. Nestle develops its own printing plates; this activity generates waste waters that are discharged to the sewer system (SWMU 6). Silver-contaminated waste water is pretreated in three Silver Recovery Units (SWMU 9). Unusable ink and spent roller wash are accumulated at the Hazardous Waste Accumulation Area (SWMU 7). The solvent- and ink-contaminated rags are accumulated in bins (SWMU 8). Nestle uses an outdoor concrete pad to store flammable, liquid, raw material. The drainage system (AOC 1) of this pad leads to an on site ditch.

Pressco currently occupies building B, which they lease from Weston. Pressco assembles machines that inspect containers, such as aluminum cans, for defects. Pressco makes the software for these machines. The company used to paint cabinets that house the machinery, but they discontinued manufacturing activities and now only assemble the equipment. A room (Hazardous Waste Accumulation Area - SWMU 10) adjacent to a loading dock is currently used for the accumulation of the one remaining drum of spent solvent (D001 and F003) generated from the painting operation.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

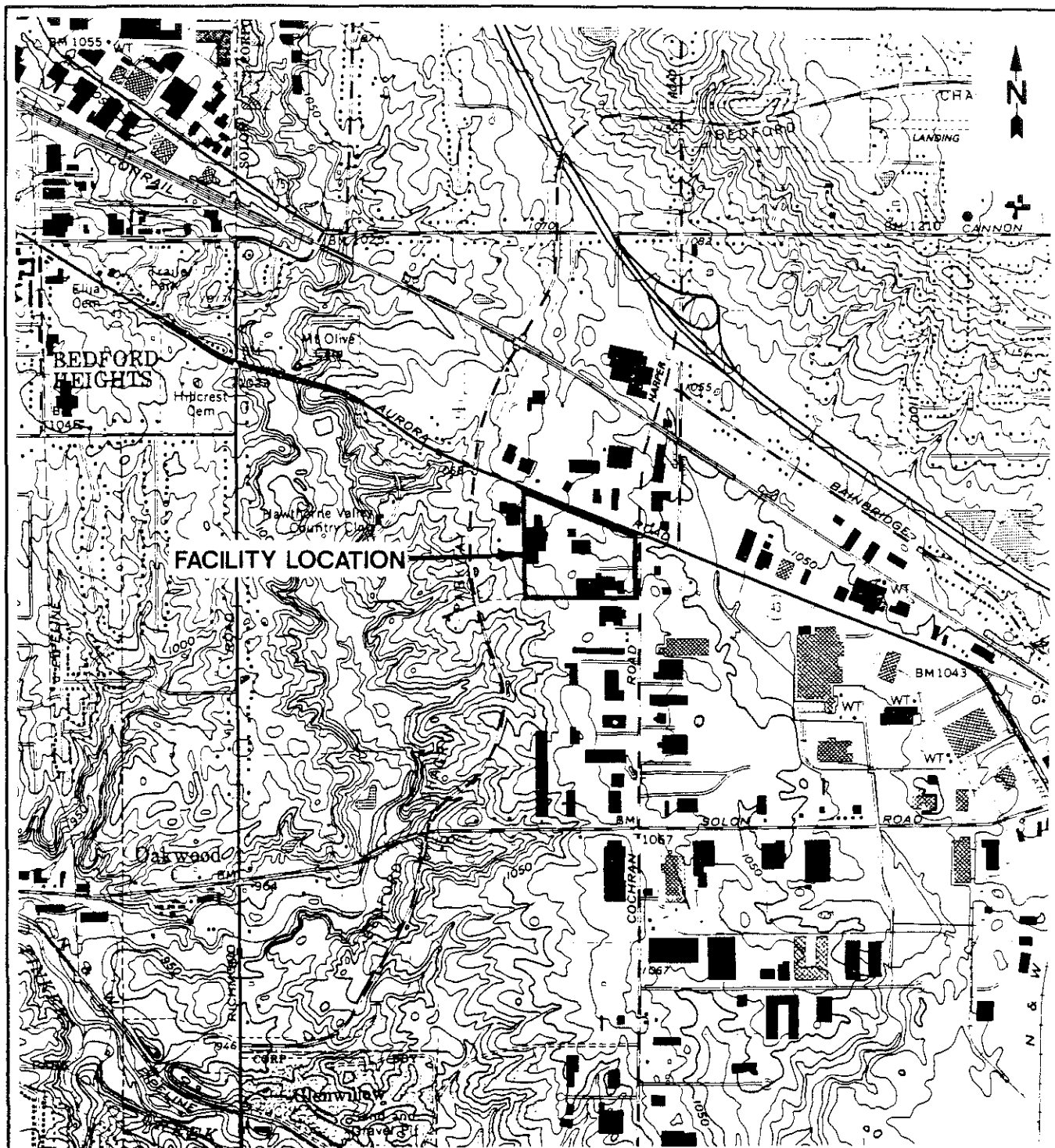
Technicare generated six wastes when they operated at this facility. Ignitable solvents (D001, F003, and F005) were generated from painting operations. Halogenated solvents (F001) were generated from degreasing operations. Lead-contaminated emission control dust (K069) was generated from secondary smelting in the company's lead casting department. The waste codes P015 (Beryllium), F004 (cresols, cresylic acid, and nitrobenzene), and D002 (spent corrosives) were listed on Technicare's Part A Permit Application (Technicare, 1982), but the sources of

these wastes could not be determined. Technicare appears to have accumulated waste at two locations, referred to as the Explosion Proof Addition to building C (SWMU 1) and the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2) (Technicare, 1982). Technicare also had an area where empty drums were stored (SWMU 3), and a Pretreatment Lime Crock (SWMU 5) that treated waste water. SWMUs 1, 2, and 3 were RCRA closed in 1987. The disposal practices of Technicare are not known.

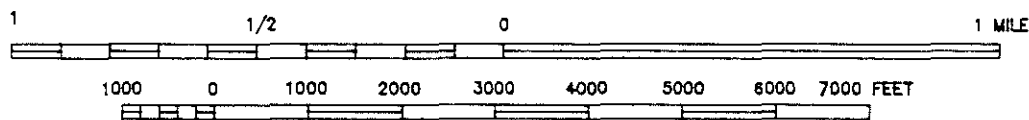
Victoreen's operations generate spent freon (F001) from degreasing circuit boards; spent methanol (F003) and spent acetone (F003) from cleaning equipment; acids and caustics (D002) from other cleaning activities, nonhazardous waste oil from maintenance of equipment, and nonhazardous dry filters from the paint spray booth. Victoreen uses a wave solder machine that generates solder dross. The dross is handled as raw material; it is recycled off site, and it is not manifested. Victoreen uses the Explosion Proof Addition (Container Accumulation Area) (SWMU 1) for hazardous material storage and waste accumulation. Equipment that has been contaminated with radioactive materials is also stored in SWMU 1.

Nestle generates a spent roller wash (D001) and unusable ink (D001) from the printing equipment. These wastes are accumulated in Nestle's Hazardous Waste Accumulation Area (SWMU 7) next to one of the loading docks. These wastes are hauled by Safety-Kleen to cement kilns, where they are burned as secondary fuel. Nonhazardous, solvent-contaminated rags are generated from cleaning the printing presses. Red metal containers (bins, approximately 10 gallons in size) (SWMU 8) located throughout the press areas are used to accumulate the dirty rags. The rags are picked up and cleaned by a local industrial laundry service. Nestle also generates an alcohol-water mixture (nonhazardous) and silver-contaminated waste water from printing plate development. The silver-contaminated waste water is treated (SWMU 9) to recover silver. All waste water is eventually discharged via sewer line (SWMU 6) to the sanitary sewer leading to a publicly owned treatment works (POTW).

Pressco used to generate spent solvent (D001 and F003) when cleaning painting equipment. However, they have eliminated the painting operation. Currently, a room (SWMU 10) adjacent to a loading dock is used for the accumulation (that is, less than 90 day storage) of the one remaining 55-gallon drum of spent solvent. Pressco does some soldering, but all solder residue is re-used. Parts washer waste water is discharged untreated to the sewer (SWMU 6).



SCALE 1:24000



SCALE 1"=2,000'



QUADRANGLE LOCATION

SOURCE: MODIFIED FROM USGS, CHAGRIN FALLS QUADRANGLE, 1984

TECHNICARE CORPORATION
SOLON, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Explosion Proof Addition (Container Accumulation Area)	Yes	Full RCRA closure 12/16/87; currently used for less than 90 days accumulation
2	Underground Storage Tank for Secondary Containment of the Explosion Proof Addition	No	Full RCRA closure 12/16/87 as part of SWMU 1 closure
3	Empty Drum Storage Area	No	Full RCRA closure 12/16/87 as part of SWMU 1 closure
4	Satellite Accumulation Area	No	Active
5	Pretreatment Lime Crock	No	Removed and sealed circa 1987
6	Sewer System	No	Active
7	Hazardous Waste Accumulation Area (Nestle)	No	Active
8	Bins for Solvent- and Ink-Contaminated Rags (numerous)	No	Active
9	Silver Recovery Units (3)	No	Active
10	Hazardous Waste Accumulation Area (Pressco)	No	Active

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

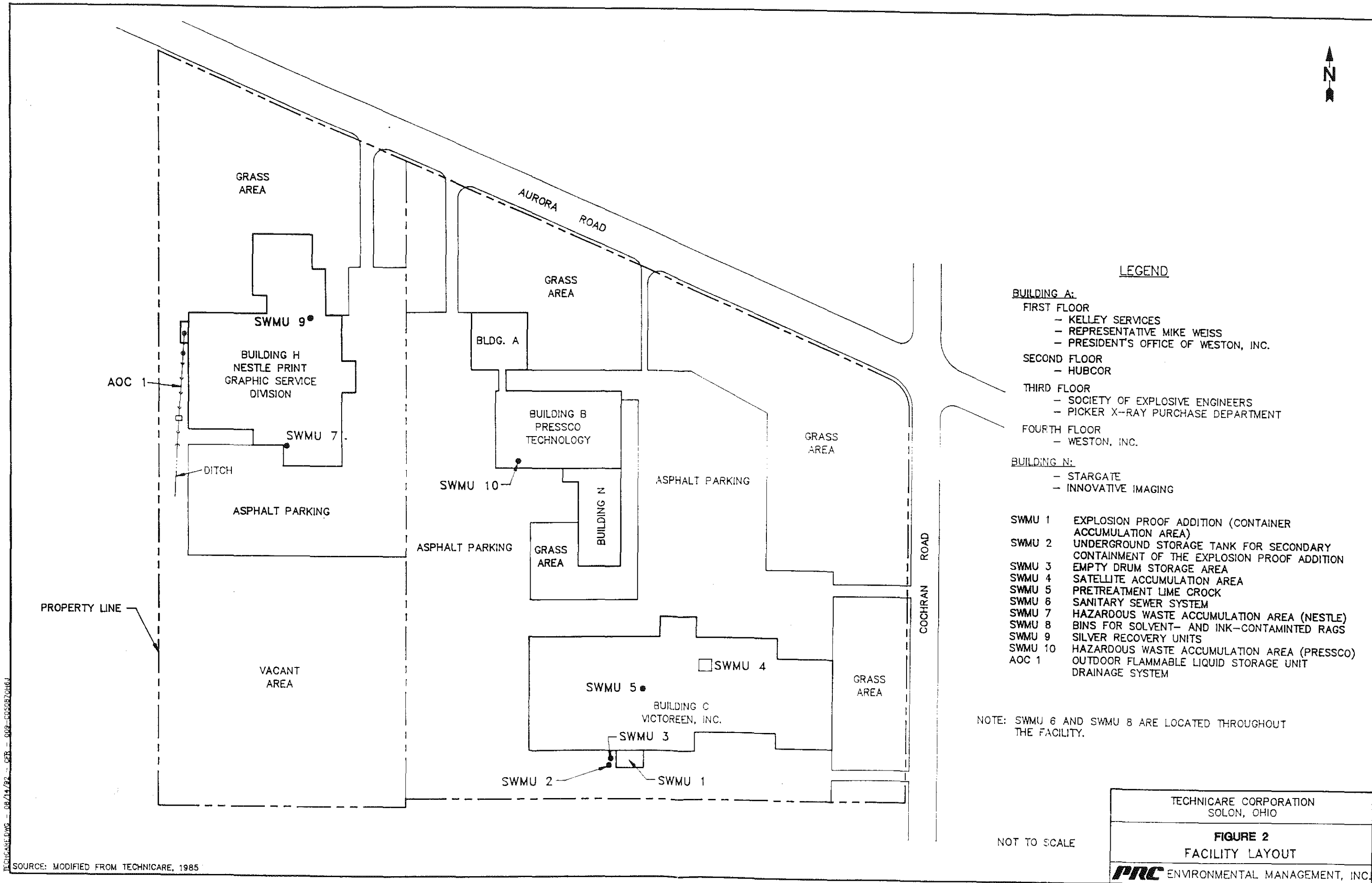


TABLE 2
SOLID WASTES
(Sheet 1 of 2)

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^b</u>
Ignitable solvents/D001, F003, and F005 ¹	Painting operation	1 and 2
Halogenated solvents/F001 ¹	Degreasing operation	1, 2, and 4
Lead-contaminated emission control dust/K069 ¹	Emission control of secondary smelting in the lead casting department	Unknown
Beryllium/P015 ¹	Unknown	Unknown
Unidentified/F004 ¹	Unknown	Unknown
Spent corrosives/D002 ¹	Chemical conversion coating operation	5 and 6
Empty drums/NA ¹	Using raw materials packaged in drums	3
Spent freon/F001 ²	Degreasing circuit boards	1 and 4
Spent methanol/F003 ²	Cleaning equipment	1 and 2
Spent acetone/F003 ²	Cleaning equipment	1 and 2
Spent corrosives/D002 ²	Cleaning equipment	1 and 2
Waste oil/NA ²	Maintenance of equipment	1 and 2
Dry paint filters/NA ²	Emission control of painting operation	1 and 2
Unusable ink/D001 ³	Discarding excess printing ink	7

TABLE 2
SOLID WASTES
(Sheet 2 of 2)

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^b</u>
Spent roller wash/D001 ³	Discarding the solvent roller wash used in the presses	7
Silver-contaminated waste water/NA ³	Developing photographic plates	9
Alcohol-water mixture/NA ³	Used in the plate development process	6
Solvent- and ink-contaminated rags/NA ³	Cleaning printing presses	8
Spent solvent/D001 and F003 ⁴	Cleaning painting equipment	10
Parts washer waste water/NA ⁴	Circuit board washer	6

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b "Unknown" indicates that the waste was generated at the facility but that the SWMU that managed the waste cannot be determined.

¹ Generated by Technicare when they occupied this site

² Generated by Victoreen

³ Generated by Nestle

⁴ Generated by Pressco

2.4

HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

One release, and its remediation, at this site has been documented. In 1986, Woodward-Clyde Consultants (WCC) conducted a Phase I Site Assessment for Weston and discovered the following organic compounds in the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition and the ground water adjacent to the tank: 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons (WCC, 1987). The concentrations of the contaminants were not identified. Technicare received OEPA approval of its closure plan on June 29, 1987 (OEPA, 1987a). The closure plan addressed three SWMUs: the Explosion Proof Addition (Container Accumulation Area) (SWMU 1), the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2), and the Empty Drum Storage Area (SWMU 3). These SWMUs were located adjacent to building C (Technicare, 1986). The tank and a large amount of soil were sent as hazardous waste to a hazardous waste disposal facility (details of these activities are not known). Following these activities, the soil tested clean (OEPA, 1988). OEPA provided Technicare with a letter of closure completion dated December 16, 1987 (OEPA, 1987b).

On September 27, 1987, an environmental assessment was performed by WCC for Weston, Inc. WCC evaluated the "general physical and environmental setting, handling of waste products, nature of plant discharges (air and water), and general features of the plant that may contribute to existing or future environmental problems." WCC suggests in the assessment that "the facility does not represent an environmental liability with the exception of the [Underground Storage Tank for Secondary Containment of the Explosion Proof Addition]," (SWMU 2) which went through closure subsequent to this assessment (WCC, 1987).

No other on-site releases were identified during the PA/VSI.

2.5

REGULATORY HISTORY

Technicare originally submitted a Notification of Hazardous Waste Activity form to EPA on August 18, 1980 as a generator and treatment, storage, or disposal facility (TSDF) (Technicare, 1980a). Technicare submitted a Part A Permit Application to EPA on November 8, 1980 for hazardous waste storage in containers (S01) and treatment in a unit other than a tank, surface impoundment, or incinerator (T04) (Technicare, 1980b). (The T04 code appears to represent the

Pretreatment Lime Crock used to neutralize waste water from the chemical conversion coating operation.) A subsequent Part A Permit Application, dated April 15, 1982, omitted the process code T04 (Technicare, 1982). The most recent Technicare Part A Permit Application, dated October 22, 1985, indicates container storage (S01) and tank treatment (T01) for the waste codes D001, D008, F001, F003, F004, and F005 (Technicare, 1985). No documentation supports this Part A Permit Application's indication that treatment in a tank occurred on site.

Technicare has not occupied this site since 1987, when the container and tank storage units were closed. Technicare's Part A Permit Application was withdrawn, per OEPA's December 16, 1987 letter of closure completion (OEPA, 1987b). Victoreen, Nestle, and Pressco are generators of hazardous waste, and each has its own EPA identification number. Victoreen is a small-quantity generator. Nestle and Pressco are conditionally exempt small-quantity generators. These companies do not treat, store, or dispose of hazardous waste on site. The facility has no processes that require permitting under RCRA.

The most recent government compliance evaluation inspection (CEI) was conducted on June 29, 1987 by OEPA. No violations were documented during this inspection (OEPA, 1987c). Technicare's only documented RCRA violation was observed by OEPA on July 23, 1981; Technicare was accumulating ignitable hazardous waste within 50 feet of its property line (OEPA, 1981). Presumably, this was resolved by relocating the waste so that it was adjacent to building C. The date the waste was first stored in the Explosion Proof Addition (Container Accumulation Area) is not known. The construction date of this unit could not be determined.

Technicare was issued air permits to operate some of its equipment, but none of the current operations at this site appear to require air permits. According to the Victoreen facility representative, Victoreen submitted information to OEPA regarding its emissions, but OEPA considered the submittals unnecessary due to the low volume of contaminants. No air permit violations have been cited for any of these facilities.

The companies operating at this facility do not require a NPDES permit, according to facility representatives. All of these companies discharge waste water to the sewer system (SWMU 6). According to the facility representatives, the Solon Sanitary District monitors the discharges from these companies, and these companies have never been required to obtain permits for this discharge.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Cuyahoga County is continental. The average daily temperature is 50 degrees Fahrenheit (°F). The lowest average daily temperature is 27°F in January. The highest average daily temperature is 72°F in July. In summer, northern areas nearest Lake Erie are markedly cooler than the rest of the county (USGS, 1978).

The total annual precipitation for the county is 35 inches. The mean annual lake evaporation for the area is about 31 inches (USGS, 1978). The average 1-year, 24-hour maximum rainfall is about 4.0 inches.

The prevailing wind is from the southwest. Average wind speed is highest in January at 13 miles per hour (USSCS, 1980).

Precipitation is well distributed during the year. Sixty percent of the total annual precipitation usually falls from April to September. Snow squalls are frequent from late fall through winter, and total snowfall is normally heavy. Crop development early in the growing season is slowed by frequent cool winds from Lake Erie. Fall winds that blow from a relatively warm Lake Erie delay the first fall freeze and prolong the growing season for all crops. The average growing season in Cuyahoga County is about 225 days (USSCS, 1980).

2.6.2 Flood Plain and Surface Water

The facility is not located within a 100-year flood plain. The nearest surface water body is Tinkers Creek, which is located about 1.3 miles west of the facility (FEMA, 1981). There is also a small, intermittent, on-site ditch south of building H. The ditch is filled with emergent vegetation, and its discharge point is unknown.

Other than visual observation, no information regarding surface water runoff is available. The ditch on the southwest corner of the facility, which is Nestle's property, may receive surface water runoff from the adjacent parking lot. Most surface water runoff appears to discharge to on-site storm sewers, which discharges to the City of Solon's POTW.

2.6.3 Geology and Soils

Soils in the area around the facility are comprised of the Mahoning - Urban Land complex association. This association is about 55 percent Mahoning silt loam and 30 percent Urban land. Mahoning soil is nearly level and gently sloping, somewhat poorly drained, and medium textured. These soils have slow to very slow permeability and a seasonal high water table at a depth of 12 to 30 inches. Urban land consists of areas that are covered by streets, parking lots, buildings, and other structures that so obscure or alter the soils that identification is not feasible (USSCS, 1980).

Site-specific geology information is not available; therefore, regional information is presented. The southeast portion of Cuyahoga county is located in the glaciated Allegheny Plateau of the Appalachian Plateau Province. Topography in the Allegheny Plateau is characterized by mature river valleys, while the Central Lowland topography is controlled predominately by thick glacial deposits (Leverett and Van Horn, 1931; White, 1982).

Two general classes of deposits exist: glacially derived, unconsolidated deposits of Quaternary age and consolidated sandstone and shale of Paleozoic age. The glacial deposits in the area are of Wisconsinan age or older.

The bedrock units in the area dip slightly to the south and south-southeast at about 20 feet per mile (Leverett and Van Horn, 1931). Devonian age bedrock outcrops along river valleys along Lake Erie. Bedrock units become progressively younger to the south. The uppermost bedrock unit is the Sharon Conglomerate of the Pottsville Group of Pennsylvanian age. It ranges from 0 to 150 feet thick. Underlying this unit is the Cuyahoga Group of Mississippian age, which is 160 to 425 feet thick and is composed primarily of blue to gray shale, with alternating beds of sandy shale and sandstone. The Berea Sandstone underlies the Cuyahoga Group and ranges in thickness from 5 to 150 feet. The Berea Sandstone overlies the Bedford Shale, which is composed of firm-to-soft gray siliceous shale, ranging in thickness from 50 to 90 feet. This formation overlies the Ohio Shale of Devonian age, which is more than 400 feet thick. The Ohio Shale formation is predominately black carboniferous shale, with beds of greenish-gray shale. Underlying this unit is a series of older, Paleozoic era limestones, sandstones, and shales (Leverett and Van Horn, 1931; Banks and Feldmann, 1970; White, 1982).

2.6.4 Ground Water

Site-specific ground water information is not available; therefore, regional information is presented. The use of ground water in the county is limited to water-bearing formations within

bedrock; alluvial and glacial outwash deposits found mostly in valleys; and, to a lesser extent, sand and gravel lenses and sheets associated with the glacial drift. Existing valleys generally contain thick deposits of sand and gravel from glacial outwash. Wells in these deposits can yield up to 500 gallons per minute (gpm). The glacial outwash has an estimated hydraulic conductivity of 10^{-3} to 10^{-1} centimeters per second (cm/sec) (Bloyd, 1974; Fetter, 1988).

Glacial deposits also may be a source of ground water where the deposits overlie Ohio Shale, especially where the drift is thick and contains a large percentage of sand (Leverett and Van Horn, 1931). The hydraulic conductivity for such aquifers is estimated to be less than 10^{-3} cm/sec (Bloyd, 1974). Water-bearing formations within Paleozoic bedrock include Sharon Conglomerate and Berea Sandstone. The Sharon Conglomeration is 0 to 50 feet thick and the Berea Sandstone is 5 to 150 feet thick. Both aquifers have an estimated hydraulic conductivity 10^{-3} to 10^{-8} cm/sec; wells in these units can yield from 25 to 100 gpm (Bloyd, 1974; Freeze and Cherry, 1979). The estimated depth to groundwater at the facility is 60 feet below surface. Generally, local ground-water flow in shallow glacial aquifers is controlled by surface topography and discharges into nearby rivers or lakes. The regional ground-water flow in bedrock is most likely toward the Appalachian Basin to the south (Bloyd, 1974).

2.7 RECEPTORS

The facility occupies 43 acres in an industrial and commercial area in Solon, Ohio. Solon has a population of about 18,548. The facility has no perimeter fences. However, all SWMUs at this facility are either located inside buildings or have been RCRA closed and are no longer used for managing wastes. Each building at the facility has controlled access, utilizing security guards or one entrance with a receptionist. Victoreen utilizes monitoring cameras. AOC 1 is the only unit at the facility with unrestricted access.

The facility is bordered on the north by two vacant office buildings, Mammesmann Demag, Belcan Specialty, and Bows Manufacturing; on the west by Tool-Die Engineering; on the south by Albany Valve and Fitting; on the east by two high-rise office buildings; and on the northeast by a Sunoco Oil Co. gas station and several industrial warehouses. The nearest residences are single family homes located about 500 yards south of the facility.

The nearest surface water body is Tinker Creek, which is approximately 1.3 miles west of the facility. Other surface water bodies in the area include Meadow Lake and Briar Hill Lake, which are greater than 2 miles from the facility (PRC, 1992).

Ground water is used as a drinking water and industrial water supply. The nearest private drinking water well is located 2 miles south and downgradient of the facility (PRC, 1992). The nearest industrial well is located at Lindberg Heat Treating Co., which is approximately 0.1 mile south the facility (PRC, 1992).

No on-site sensitive environments are indicated on National Wetlands Inventory (NWI) maps reviewed. However, a small, on-site ditch near the west side of the facility appears to be a palustrine wetland. Thirteen sensitive environments (each a palustrine wetland) larger than two acres are located within two miles of the facility: three forested wetlands to the southwest; two forested wetlands to the southeast; one forested wetland to the northeast; one forested wetland to the northwest; three open water wetlands to the east; one open water wetland to the west; one emergent wetland to the east; and one emergent wetland to the north (NWI, 1977). The nearest sensitive environment indicated on the 1977 NWI maps is the palustrine, forested wetland located 1/4 mile northeast of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the ten SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Explosion Proof Addition (Container Accumulation Area) (Technicare and Victoreen)

Unit Description:

The Explosion Proof Addition (Container Accumulation Area) is 55 feet by 20 feet. The floor is concrete and slopes towards its center. Prior to RCRA closure of this unit, the floor drained to the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2). The SWMU's walls are made of concrete block, and the ceiling appears to be designed to vent an explosion.

Victoreen added a concrete block wall with a door, effectively creating two rooms. The larger room, approximately two-thirds the size of the original room, is used for hazardous material and waste storage. The smaller room, approximately one-third the size of the original room, is used for storage of radioactive raw material and equipment contaminated with radioactive material.

Adjacent to the building's door that exits outside the building is a trench in the concrete floor covered by a steel grate. This trench is approximately 4 feet long, 5 inches wide, and 3 inches deep. The purpose of the trench appears to be to prevent rain water that seeps under the door from traveling further into the room.

Date of Startup:

The exact date of startup is not known. Presumably, this SWMU was added to the facility in response to an OEPA inspection on July 23, 1981 that identified the need to relocate hazardous waste that was stored within 50 feet of the facility's property line (OEPA, 1981).

Date of Closure:

RCRA closure was completed for this SWMU December 16, 1987.

Wastes Managed:	This unit was used by Technicare and is currently used by Victoreen for storage and accumulation, respectively, of hazardous waste. Wastes handled in this unit include: ignitable solvents (D001, F003, and F005), halogenated solvents (F001), spent freon (F001), spent methanol (F003), spent acetone (F003), spent corrosives (D002), and nonhazardous waste oil.
Release Controls:	This SWMU has a concrete floor that slopes toward its center and four concrete block walls, three of which have a door. Prior to this SWMU's closure in 1987, a floor drain connected this unit to the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2). Any spills within this room would have been directed to the underground tank.
History of Documented Releases:	No releases from this SWMU have been documented. Contamination of the soil adjacent to this SWMU was observed during closure; however, the source was determined to be an adjacent underground tank (SWMU 2).
Observations:	No evidence of a release from this SWMU was observed. The concrete floor does not have any cracks, and no staining of its surface was observed (see photographs 4 and 5). The unit was being used for less than 90 day storage of ignitable solvents (D001, F003, and F005), halogenated solvents (F001), spent freon (F001), spent methanol (F003), spent acetone (F003), spent corrosives (D002), and nonhazardous waste oil.
SWMU 2	Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (Technicare)
Unit Description:	The Underground Storage Tank for Secondary Containment of the Explosion Proof Addition was a horizontal, 500-gallon, underground, concrete tank with a manhole. According to Technicare's Closure Plan, the tank measured 6 feet long by 4 feet wide by 6 feet deep (Technicare, 1986). This SWMU was secondary containment for the Explosion Proof Addition (Container Accumulation Area) (SWMU 1).

Date of Startup:	The exact date of startup is not known. Presumably, this SWMU was added to the facility at the same time the Explosion Proof Addition (Container Accumulation Area (SWMU 1) was added (circa 1982).
Date of Closure:	RCRA closure was completed for this SWMU on December 16, 1987.
Wastes Managed:	This SWMU may have managed any of the wastes managed by SWMU 1, because it served as secondary containment for that unit. Those wastes include ignitable solvents (D001, F003, and F005), halogenated solvents (F001), spent methanol (F003), spent acetone (F003), spent corrosives (D002), and waste oil (nonhazardous). Prior to the unit's closure, water inside the tank was sampled. The analysis indicated the presence of 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons (WCC, 1987).
Release Controls:	This SWMU had no release controls.
History of Documented Releases:	In 1986, the presence of 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons in the water within the tank and in the adjacent ground water confirmed that this SWMU was leaking (WCC, 1987). Technicare submitted a closure plan, which OEPA approved on June 29, 1987. The tank and contaminated soil were removed and sent to a hazardous waste disposal facility (details unknown). OEPA provided Technicare with a letter of closure completion, dated December 16, 1987.
Observations:	No evidence of a release from this SWMU was observed. The location of this SWMU is now paved with asphalt (see photograph 6).

SWMU 3**Empty Drum Storage Area (Technicare)****Unit Description:**

The Empty Drum Storage Area measured 17 feet by 14 feet. Details regarding the use and construction materials of this SWMU are not known. Presumably, the empty drums stored in this area included hazardous material and waste drums that had been emptied, because this SWMU went through RCRA closure along with the Explosion Proof Addition (Container Accumulation Area) (SWMU 1) and the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2). Technicare appears to be the only company that used this SWMU. The Empty Drum Storage Area was located on the ground above SWMU 2. Following closure activities, this area was paved with asphalt (see photograph 6).

Date of Startup:

The date of startup is unknown.

Date of Closure:

RCRA closure was completed for this SWMU on December 16, 1987.

Wastes Managed:

Other than empty drums, the wastes managed at this SWMU are unknown.

Release Controls:

This SWMU apparently had no release controls.

**History of
Documented Releases:**

No releases from this SWMU have been documented. In 1986, the soil and ground water below this unit were discovered to be contaminated with 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons, but the contamination source was determined to be the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (SWMU 2) (WCC, 1987).

Observations:

No evidence of a release was observed from this SWMU. The location of this SWMU is now covered with asphalt.

SWMU 4**Satellite Accumulation Area (Victoreen)**

Unit Description: The Satellite Accumulation Area is located in building C, near the center of the plant's east side. The SWMU consists of two 55-gallon drums with covered funnels attached to their tops. The SWMU's floor is tile on top of concrete, though cardboard has been placed below one of the drums. Metal partitions separate this area, which includes the vapor degreasers, from the surrounding plant.

Date of Startup: The date of startup is approximately 1988, when Victoreen began operating at this site.

Date of Closure: This SWMU is active.

Wastes Managed: This SWMU manages spent freon (trichlorotrifluoroethane) (F001).

Release Controls: This SWMU's floor is constructed of tile on top of concrete.

History of Documented Releases: No release from this SWMU has been documented.

Observations: Mottled staining of the tile floor of this SWMU was observed during the VSI. The activities that generate the waste managed by the SWMU are located in the same area as the SWMU (see photographs 1 and 2).

SWMU 5**Pretreatment Lime Crock (Technicare)**

Unit Description: The Pretreatment Lime Crock was a waste water neutralization unit located in a manhole-size drain to the sanitary sewer. The SWMU consisted of limestone gravel, which was the material used to treat the waste water from the chemical conversion coating operation as it was discharged to the sewer. This SWMU also may have been used for neutralizing waste water from a photographic negative processing operation. The exact dimensions of the unit are not known.

Date of Startup: The date of startup is unknown.

Date of Closure: This SWMU was dismantled, cleaned, and sealed when Technicare moved out in 1987. However, it was not included in the formal closure of other SWMU.

Wastes Managed: Wastes managed included spent corrosives (D002) and, possibly, photographic negative processing waste waters.

Release Controls: Release controls associated with this SWMU are not known.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: No evidence of a release from this SWMU was observed. The manhole cover to this SWMU was the only part visible for inspection (see photograph 3).

SWMU 6 Sewer System (Technicare, Victoreen, Nestle, and Pressco)

Unit Description: Details of the Sewer System were not obtained. The Sewer System conveys sanitary and industrial process waste water from the five buildings on the site to the Publicly Owned Treatment Works (POTW) of Solon, Ohio.

Date of Startup: The date of startup is unknown. This SWMU may have been installed in 1973, because Technicare began operations at this site on March 1, 1973.

Date of Closure: This SWMU is active.

Wastes Managed: The Sewer System manages both sanitary and industrial process waste water. The industrial process waste waters include waste water from Nestle's printing plate developing operations and Pressco's circuit board washer. The unit also received Technicare's discharge from the Pretreatment Lime Crock (SWMU 5).

Release Controls: This SWMU is designed to convey waste water; its piping serves as a release control.

History of
Documented Releases:

No releases from this SWMU have been documented.

Observations:

No observations were made, because the SWMU is located underground.

SWMU 7

Hazardous Waste Accumulation Area (Nestle)

Unit Description:

Nestle's Hazardous Waste Accumulation Area is located adjacent to a loading dock on the east side of building H. This SWMU has a level, concrete floor. One of the walls has a metal door and one has an open doorway leading to the dock. This SWMU was apparently not used by Technicare for any waste management activity.

Date of Startup:

The date of startup is not known. The floor of this SWMU was constructed by Technicare. Nestle added the metal enclosure to the loading dock in 1991 and began accumulating waste at this SWMU.

Date of Closure:

This SWMU is active.

Wastes Managed:

Unusable ink (D001) and spent roller wash solvent (D001) are accumulated at this SWMU.

Release Controls:

The SWMU has a concrete floor. Also, the entrance ramp of the adjacent loading dock is approximately five feet below the floor level of this SWMU. A release from this SWMU would either be contained by the surrounding wall or would migrate toward the dock, where it would eventually be detained in the containment area created by the entrance ramp.

History of
Documented Releases:

No releases from this SWMU have been documented.

Observations:

The concrete pad appeared to be relatively new. It was not stained or cracked (see photograph 9).

SWMU 8**Bins for Solvent- and Ink-Contaminated Rags (numerous) (Nestle)****Unit Description:**

The Bins for Solvent- and Ink-Contaminated Rags are red, metal containers with tops that are opened by stepping on a metal lever connected to the container. These containers are cylindrical and measure approximately two feet high by two feet in diameter. These containers are either stationary and situated on the floor or possess wheels so they can be easily relocated.

Date of Startup:

These SWMUs have been used since Nestle began operating in 1988.

Date of Closure:

These SWMUs are active.

Wastes Managed:

These SWMUs manage rags contaminated with ignitable solvents and ink.

Release Controls:

These SWMUs are located on concrete.

**History of
Documented Releases:**

No releases from these SWMUs have been documented.

Observations:

Several of these SWMUs are located near each printing press. The units are in good condition (that is, not rusted or bent out of shape). No releases from these SWMUs were observed. (see photograph 8)

SWMU 9**Silver Recovery Units (3) (Nestle)****Unit Description:**

Three Silver Recovery Units are located in building H. These SWMUs are 5-gallon plastic buckets containing filters that remove silver from the waste water generated by Nestle's photographic, printing plate developing process. The top on each bucket is closed tight, and waste water is conveyed to each SWMU by a plastic hose screwed into the top's bung.

Date of Startup:

These SWMUs have been used since Nestle began operating in 1988.

Date of Closure: These SWMUs are active.

Wastes Managed: These SWMUs manage silver-contaminated waste water from photographic, printing plate development operations. The recovered silver is sold.

Release Controls: These SWMUs are located on concrete floors covered with tile.

History of Documented Releases: No releases from these SWMUs have been documented.

Observations: No evidence of a release was observed during the VSI. These SWMUs are in good condition (that is, they are not rusted or bent out of shape) (see photograph 7).

SWMU 10

Hazardous Waste Accumulation Area (Pressco)

Unit Description: Pressco's Hazardous Waste Accumulation Area is located in the maintenance room on the south side of building B. The maintenance room measures approximately 20 feet by 15 feet. The area within the room where hazardous waste is accumulated measures approximately 6 feet by 4 feet. The floor is concrete, and the walls of the room are concrete block.

Date of Startup: This SWMU has been used since Pressco began operations in 1991.

Date of Closure: This SWMU is active. Pressco's painting operation has been discontinued, but this SWMU currently contains one drum of spent solvent.

Wastes Managed: This SWMU manages spent solvent (D001 and F003) from Pressco's former painting operation.

Release Controls: This SWMU has a concrete floor and concrete block walls.

History of Documented Releases: No releases from this SWMU have been documented.

Observations:

One drum of spent solvent (D001 and F003) was observed at this SWMU during the VSI. No stains or cracks were observed on the floor. No evidence of a release was observed (see photograph 13).

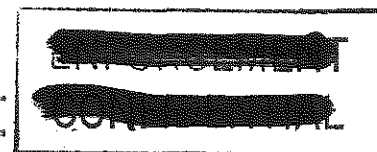
4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown on Figure 2.

AOC 1 Outdoor Flammable Liquid Storage Area Drainage System (Nestle)

The Outdoor Flammable Liquid Storage Area is a concrete pad located outdoors on the west side of building H. It was constructed by Technicare. According the representatives of Nestle, this storage area was never used by Technicare. In 1991, Nestle constructed a roof over the pad. Nestle uses the area for storage of raw materials (such as inks and solvents) in drums.

Located at the center of the concrete pad is a drain covered with a manhole-size steel grate. The pipe from this drain runs south. Connected to this pipe approximately 10 feet south of the drain is a covered manhole. The manhole is approximately 2.5 feet deep. At the bottom is a circular, steel plate with a diameter of approximately 9 inches. Below this plate there appears to be a catch basin for the discharge from the storage area's drain. The walls of the catch basin could not be seen, but the discharge end of the pipe (approximately 5 inches in diameter) from the storage area's drain was visible. The basin contained water, which appeared stagnant. No odor or discoloration on the structures were observed. The drain appears to eventually discharge through a pipe to an on-site ditch, which is choked with vegetation, approximately 150 feet south of the drain. No site plans or drawings describing this drainage system are available. (see photographs 10, 11, and 12)



5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified ten SWMUs and one AOC at the facility formerly known as Technicare. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1

Explosion Proof Addition (Container Accumulation Area) (Technicare and Victoreen)

Conclusions:

The Explosion Proof Addition (Container Accumulation Area) has been used for ignitable material and waste storage since its construction. The SWMU's walls are made of concrete block, and the ceiling appears to be designed to vent an explosion. The SWMU's floor is a concrete pad that slopes towards its center, where there used to be a floor drain. The floor drain was sealed during closure activities in 1987. The floor drain previously discharged to the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition adjacent to the accumulation area. During closure activities, soil and ground water in the vicinity of the underground tank were found to be contaminated with 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons (WCC, 1987). However, the source of the contamination was determined to be the leaking underground tank. The potential for release via environmental media is summarized below.

Ground Water: Low. The floor is made of concrete, and the walls are made of concrete blocks. The drain that was located in the center of the floor has been sealed closed.

Surface Water: Low. The floor is made of concrete, and the walls are made of concrete blocks. The drain that was located in the center of the floor has been sealed closed.

Air: Low. Containers are stored closed, and Victoreen safely manages the containers.

On-site Soils: Low. The floor is made of concrete, and the walls are made of concrete blocks. The drain that was located in the center of the floor has been sealed closed.

Recommendations: PRC recommends no further action at this time.

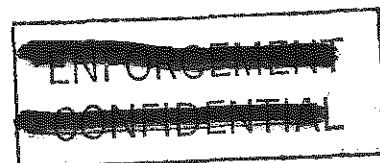
SWMU 2 Underground Storage Tank for Secondary Containment of the Explosion Proof Addition (Technicare)

Conclusions: The Underground Storage Tank for Secondary Containment of the Explosion Proof Addition was an underground, concrete tank. A release of 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons to the ground water from this SWMU was remediated during RCRA closure in 1987. Soil was removed and disposed of as hazardous waste. OEPA provided Technicare with a letter of closure completion dated December 12, 1987. Available documents do not address the remediation of the ground water. The potential for release from this unit to ground water, surface water, air, and on-site soil is low because the unit and contaminated soil were removed during RCRA closure in 1987. The potential for this release to impact ground water is high, because contamination of ground water was confirmed in 1986, and there is no indication in the closure documentation that ground water was remediated.

Recommendations: PRC recommends sampling the ground water from the available monitoring well installed in 1987.

SWMU 3 Empty Drum Storage Area (Technicare)

Conclusions: The Empty Drum Storage Area presumably stored empty, hazardous material and waste drums. Prior to closure activities, the soil and ground water below this SWMU was found to be contaminated with 1,1-dichloroethane, 1,1,1-trichloroethane, trichloroethene, and polynuclear aromatic hydrocarbons. However, the source of the contamination was determined to be the underground storage tank beneath the Empty Drum



Storage Area. The potential for current release to groundwater, surface water, air, and on-site soil is low. The potential for past releases via environmental media is summarized below.

Ground Water: Low. The potential for release would be greater if this SWMU had been situated on the soil rather than on an artificial surface, such as concrete or asphalt. (This information is not known.) In either situation, the volume of hazardous constituents present at this SWMU is likely to have been small, because the drums at this SWMU were apparently empty.

Surface Water: Low. The surface of the SWMU appears to slope away from itself, precluding containment of any surface water runoff. However, the volume of hazardous constituents present at this SWMU is likely to have been small, because the drums at this SWMU were apparently empty.

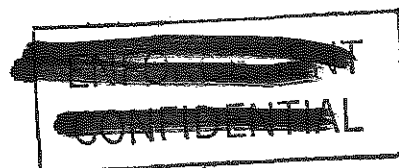
Air: Low. The type of drum, open top or bung top, used by Technicare is not known. If they are stored without tops, open-top drums are more exposed to the atmosphere than bung-top drums. In either case, the volume of hazardous constituents present at this SWMU is likely to have been small, because the drums at this SWMU were apparently empty.

On-site Soils: Low. The potential for release would be greater if this SWMU had been situated on the soil rather than on an artificial surface, such as concrete or asphalt. (This information is not known.) In either situation, the volume of hazardous constituents present at this SWMU is likely to have been small, because the drums at this SWMU were apparently empty.

Recommendations: PRC recommends no further action at this time.

SWMU 4 Satellite Accumulation Area (Victoreen)

Conclusions: The Satellite Accumulation Area consists of two 55-gallon drums with covered funnels attached to their tops. The SWMU's floor is tile on top of concrete, though cardboard has been placed on the tile below one of the drums. Metal partitions separate this area, which includes the vapor



degreasers, from the surrounding plant. Mottled staining was observed on the floor. The potential for release via environmental media is summarized below.

Ground Water: Low. The tile on top of the concrete floor provides a significant barrier to a release. Also, the SWMU is located within a building.

Surface Water: Low. The tile on top of the concrete floor provides a significant barrier to a release. Also, the SWMU is located within a building.

Air: Low. Containers within this SWMU are kept closed when not in use.

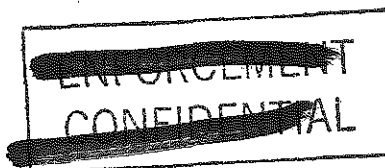
On-site Soils: Low. The tile on top of the concrete floor provides a significant barrier to a release. Also, the SWMU is located within a building.

Recommendations: PRC recommends no further action at this time.

SWMU 5 Pretreatment Lime Crock (Technicare)

Conclusions: The Pretreatment Lime Crock was a waste water neutralization unit located in a manhole-size drain to the sanitary sewer. The SWMU consisted of limestone gravel, which used to treat the waste water from the chemical conversion coating operation as it was discharged to the sewer. This SWMU also may have been used for neutralizing waste water from a photographic negative processing operation. This SWMU was dismantled, cleaned and sealed in 1987, and no release from this SWMU has been documented. Because this SWMU was located within a sewer line, and the waste water that this SWMU managed consisted of weak acids and bases, the potential for release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action at this time.



SWMU 6**Sewer System (Technicare, Victoreen, Nestle, Pressco)****Conclusions:**

Details of the Sewer System were not available. The Sewer System conveys sanitary and industrial waste water from each of the five buildings on the site to the Publicly Owned Treatment Works (POTW) of Solon, Ohio. The industrial process wastes include alcohol-water mixture from Nestle's printing plate developing operations, Pressco's parts washer waste water, and spent corrosives from the Pretreatment Lime Crock. Based on the Sewer System's construction materials and underground design, the potential for release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action at this time.

SWMU 7**Hazardous Waste Accumulation Area (Nestle)****Conclusions:**

Nestle's Hazardous Waste Accumulation Area is located adjacent to a loading dock on the east side of building H. This SWMU has a level, concrete floor and is bordered on all four sides by metal walls with metal doors. This SWMU is used to accumulate drums of unusable ink and roller wash solvent. The potential for release via environmental media is summarized below.

Ground Water: Low. This SWMU manages closed drums, has a concrete floor, and the loading dock serves as secondary containment.

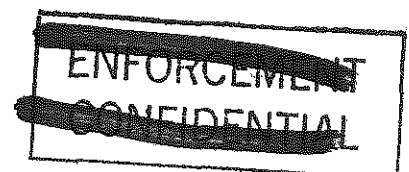
Surface Water: Low. This SWMU manages closed drums, has a concrete floor, and the loading dock serves as secondary containment.

Air: Low. This SWMU manages closed drums.

On-site Soils: Low. This SWMU manages closed drums, has a concrete floor, and the loading dock serves as secondary containment.

Recommendations:

PRC recommends no further action at this time.



SWMU 8**Bins for Solvent- and Ink-Contaminated Rags (numerous) (Nestle)****Conclusions:**

The Bins for Solvent- and Ink-Contaminated Rags are metal containers with tops that are opened by stepping on a metal lever connected to the container. These SWMUs are either stationary and situated on the floor or possess wheels so they can be easily relocated. The potential for release via environmental media is summarized below.

Ground Water: Low. These SWMUs manage solid (non-liquid) waste, and the SWMUs are kept closed.

Surface Water: Low. These SWMUs manage solid (non-liquid) waste, and the SWMUs are kept closed.

Air: Low. These SWMUs remain closed.

On-site Soils: Low. These SWMUs manage solid (non-liquid) waste, and the SWMUs are kept closed.

Recommendations: PRC recommends no further action at this time.

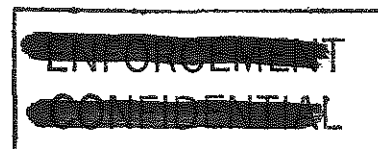
SWMU 9**Silver Recovery Units (3) (Nestle)****Conclusions:**

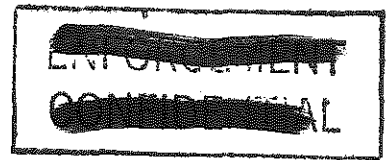
Three Silver Recovery Units, 5-gallon plastic buckets containing filters, remove silver from the nonhazardous waste water generated by a photographic, printing plate developing process. The potential for release via environmental media is summarized below.

Ground Water: Low. The SWMUs have tightly closed tops, are located on a concrete floor covered with tile, and Nestle properly manages these SWMUs.

Surface Water: Low. The SWMUs have tightly closed tops, are located on a concrete floor covered with tile, and Nestle properly manages these SWMUs.

Air: Low. The SWMUs have tightly closed tops.





On-site Soils: Low. The SWMUs have tightly closed tops, are located on a concrete floor covered with tile, and Nestle properly manages these SWMUs.

Recommendations: PRC recommends no further action at this time.

SWMU 10 Hazardous Waste Accumulation Area (Pressco)

Conclusions: Pressco's Hazardous Waste Accumulation Area has a concrete floor and the walls of the room are concrete block. The potential for release via environmental media is summarized below.

Ground Water: Low. The SWMU has a concrete floor, is enclosed within a concrete room, and containers are stored closed.

Surface Water: Low. The SWMU has a concrete floor, is enclosed within a concrete room, and containers are stored closed.

Air: Low. The containers within the SWMU are kept closed.

On-site Soils: Low. The SWMU has a concrete floor, is enclosed within a concrete room, and containers are stored closed.

Recommendations: PRC recommends no further action at this time.

AOC 1 Outdoor Flammable Liquid Storage Unit Drainage System (Nestle)

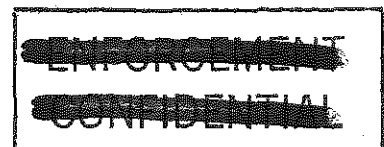
Conclusions: The Outdoor Flammable Liquid Storage Area is a concrete pad located outside on the west side of building H. This storage area was apparently never used by Technicare. In 1991, Nestle constructed a roof over the pad. Nestle uses the area for raw material ink and solvent drum storage.

Located at the center of the concrete pad is a drain covered with a manhole-size steel grate. The pipe from this drain connects to a catch basin about 10 feet south of the drain. The basin contained water, which appeared stagnant. No odor or discoloration of the structures were observed. The drain appears to discharge through the pipe to an on-site

ditch south of the drain. No other information was available regarding this drainage system.

The floor of the Outdoor Flammable Liquid Storage Area did not appear stained, and the raw material containers were maintained in good condition. No release is evident from this unit. However, the existing drainage system of this unit will facilitate the release of a spill to the surface waters in the ditch.

Recommendations: PRC recommends sealing the drain in the Outdoor Flammable Liquid Storage Area with concrete.



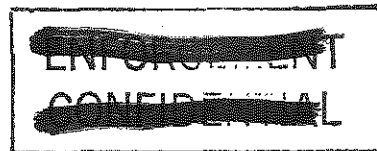


TABLE 3
SWMU AND AOC SUMMARY
(Sheet 1 of 2)

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Explosion Proof Addition (Container Accumulation Area)	Circa 1982 to 1987	No	None
2. Underground Storage Tank for Secondary Containment of the Explosion Proof Addition	Circa 1982 to 1987	Soil and ground water contamination discovered in 1986; RCRA closure completed 12/16/87	Collect and analyze samples of ground water from on-site monitoring well
3. Empty Drum Storage Area	Unknown to 1987	No	None
4. Satellite Accumulation Area	1988 to present	Minor staining observed on tile floor during the VSI	None
5. Pretreatment Lime Crock	Unknown to 1987	No	None
6. Sewer System	Unknown to present	No	None
7. Hazardous Waste Accumulation Area (Nestle)	Unknown to present	No	None
8. Bins for Solvent- and Ink- Contaminated Rags (numerous)	1988 to present	No	None
9. Silver Recovery Units (3)	1988 to present	No	None
10. Hazardous Waste Accumulation Area (Pressco)	1991 to present	No	None

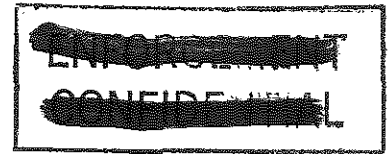


TABLE 3
SWMU AND AOC SUMMARY
(Sheet 2 of 2)

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Outdoor Flammable Liquid Storage Unit Drainage System	Unknown to present	No	Seal the drain leading to the ditch

REFERENCES

- Banks, P. O., and Rodney M. Feldman, 1970. Guide to the Geology of Northeastern Ohio, Northern Ohio Geological Society.
- Bloyd, Jr., Richard M., 1974. Summary Appraisals of the Nation's Ground-Water Resources - Ohio Region, Geological Survey Professional Paper 813-A.
- Federal Emergency Management Agency (FEMA), 1981. National Flood Insurance Program, Cuyahoga County, Ohio.
- Fetter, C.W., 1988. Applied Hydrogeology, 2nd Edition, Merrill Publishing Co., Columbus, OH, 592p.
- Freeze, R.A., and John A. Cherry, 1979. Groundwater. Prentice Hall, Inc., Englewood, N.J. 591p.
- Leverett, Frank, and Frank R. Van Horn, 1931. Geology and Mineral Resources of the Cleveland District, Ohio. U.S. Geological Survey (USGS) Bulletin 818, 138p.
- National Wetlands Inventory (NWI), 1977. Chagrin Falls Quadrangle, Ohio.
- Ohio Environmental Protection Agency (OEPA), 1981. OEPA Compliance Evaluation Inspection (CEI) report, July 23.
- OEPA, 1987a. Letter from Thomas Crepeau, OEPA, to Thomas Copeland, Technicare, June 29.
- OEPA, 1987b. Letter from Thomas Crepeau, OEPA, to Thomas Copeland, Technicare, December 16.
- OEPA, 1987c. OEPA Compliance Evaluation Inspection (CEI) report, June 29.
- OEPA, 1988. Memorandum from Gordon Garcia, EPA, to Mark Bergman regarding a telephone conversation, January 6.
- PRC Environmental Management, Inc. (PRC), 1992. Preliminary Assessment/Visual Site Assessment of Lindberg Heat Treating Co.
- Technicare Corporation (Technicare), 1980a. Notification of Hazardous Waste Activity form.
- Technicare, 1980b. Part A Permit Application.
- Technicare, 1982. Revised Part A Permit Application.
- Technicare, 1985. Revised Part A Permit Application and facility layout.
- Technicare, 1986. "The Technicare Corporation Hazardous Waste Facility Closure Plan, August 9.
- U.S. Geological Survey, (USGS), 1978. Summary Appraisals of the Nation's Ground-Water Resources -- Great Lakes Region (Geological Survey Professional Paper 813-J).
- USGS, 1984. Chagrin Falls Quadrangle.

REFERENCES (Cont'd)

U.S. Soil Conservation Service (USSCS), 1980. Soil Survey of Cuyahoga County, Ohio.

White, George W., 1982. Glacial Geology of Northeastern Ohio. ODNR, Division of Geological Survey, Bulletin 68, 75 p.

Woodward-Clyde Consultants (WCC), 1987. Final Report of the Environmental Audit/Assessment for the Technicare Facility, September 29.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER
OHD 055 827 489

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Technicare Corporation		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 29000 Aurora Road			
03 CITY Solon	04 STATE OH	05 ZIP CODE 44139	06 COUNTY Cuyahoga	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41° 24' 00" N		LONGITUDE 81° 28' 00" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) West 100 yards from the intersection of Aurora Road and Harper/Cochran Rd. turn south into driveway.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) West third: Nestle Corp./East two thirds: Weston, Inc.		02 STREET (Business, mailing, residential) 29200 Aurora Rd./29100 Aurora Rd.			
03 CITY Solon/Solon	04 STATE OH/OH	05 ZIP CODE 44139/44139	06 TELEPHONE NUMBER (216) 248-1800/(216) 349-9564		
07 OPERATOR (if known and different from owner) Nestle Print Graphic Service Div. (multiple sites)		08 STREET (Business, mailing, residential) 29200 Aurora Rd./29100 Aurora Rd.			
09 CITY Solon/Solon	10 STATE OH/OH	11 ZIP CODE 44139/44139	12 TELEPHONE NUMBER (216) 248-1800/(216) 349-9564		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 11/08/80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY (Check all that apply) <input type="checkbox"/> YES DATE 07/16/92 - 07/17/92 <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> NO <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____		02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR ENDING YEAR 1973 1987 <input type="checkbox"/> UNKNOWN	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Ignitable, chlorinated, and fluorinated solvents; lead; beryllium; acids and bases; silver; waste ink; and waste oil.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The drainage system of the Outdoor Flammable Liquid Storage Unit potentially discharges to an on-site ditch.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448		
04 PERSON RESPONSIBLE FOR ASSESSMENT John Maher	05 AGENCY	06 ORGANIZATION PRC-EMI	07 TELEPHONE NUMBER (208) 255-4166	08 DATE 07/16/92 - 07/17/92 MONTH DAY YEAR	

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Technicare Corporation
29000 Aurora Road
Solon, Ohio
OHD 055 827 489

Date: 07/16/92 and 07/17/92

Primary Facility Representative: Mike Tomaro (for Weston, Inc.)
Dave Dechant (for Nestle Print Graphic Service Division)
Michael Goffos (for Victoreen, Inc.)
Frank Calia (for Pressco Technology, Inc.)

Representative Telephone No.: Weston, Inc.: (216) 349-9564
Nestle Print Graphic Service Division: (216) 248-1800
Victoreen, Inc.: (216) 248-9300
Pressco Technology, Inc.: (216) 498-2600

Additional Facility Representatives: John Odorsch (Nestle Print Graphic Service Division)
Rich Artino (Nestle Print Graphic Service Division)
Ernie Aczel (Nestle Print Graphic Service Division)
Rick Patton (Nestle Print Graphic Service Division)
Debbie Dieglio (Nestle Print Graphic Service Division)

Inspection Team: John Maher (PRC, Environmental Management, Inc.)
Ron Baker (PRC, Environmental Management, Inc.)

Photographer: Ron Baker

Weather Conditions: 07/16/92: approximately 75°F, partly cloudy
07/17/92: approximately 75°F, cloudy with a light mist

Summary of Activities: The visual site inspection (VSI) began at 1:05 p.m. on 07/16/92 and at 8:00 a.m. on 07/17/92 with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tours began shortly after each introductory meeting.

Following each tour, the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 3:50 p.m. on 07/16/92 and at 12:45 p.m. on 07/17/92.



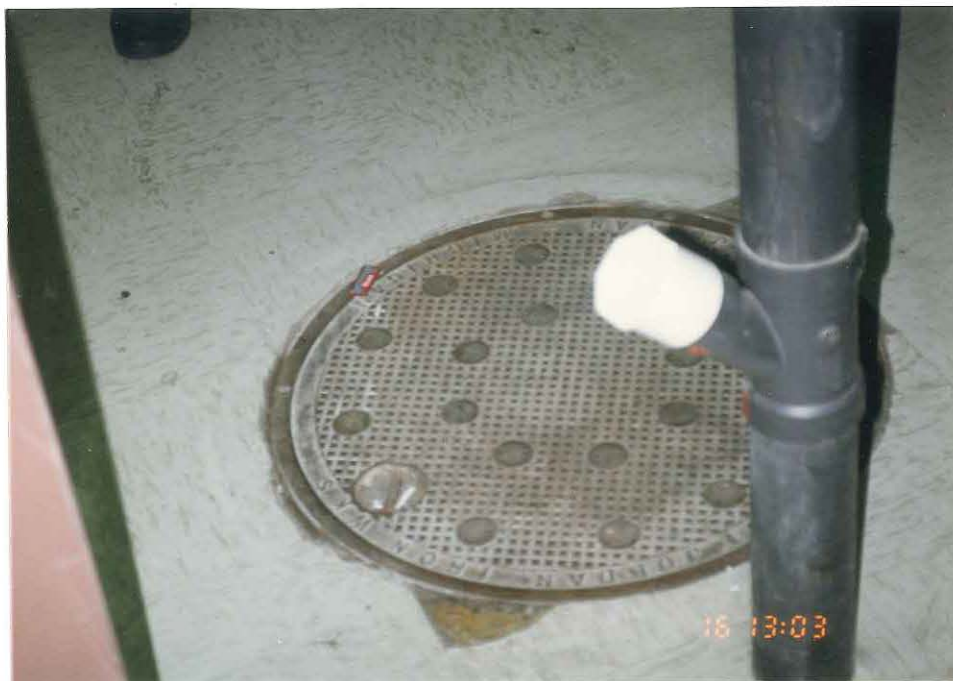
Photograph No. 1
 Orientation: East
 Description: Victoreen's satellite accumulation area

Location: SWMU 4
 Date: July 16, 1992



Photograph No. 2
 Orientation: East
 Description: Victoreen's satellite accumulation area

Location: SWMU 4
 Date: July 16, 1992



Photograph No. 3
 Orientation: East
 Description: Manhole cover of the Pretreatment Lime Crook

Location: SWMU 5
 Date: July 16, 1992



Photograph No. 4
 Orientation: Northwest
 Description: Explosion Proof Addition (Container Accumulation Area)

Location: SWMU 1
 Date: July 16, 1992



Photograph No. 5

Orientation: Southeast

Description: Outside door of the Explosion Proof Addition (Container Accumulation Area)

Location: SWMU 1

Date: July 16, 1992



Photograph No. 6

Orientation: North

Description: Former location of the Underground Storage Tank for Secondary Containment of the Explosion Proof Addition and the Empty Drum Storage Area

Location: SWMUs 3 and 4

Date: July 16, 1992



Photograph No. 7

Orientation: West

Description: Printing plate development room with Silver Recovery Units (3)

Location: SWMU 9

Date: July 17, 1992



Photograph No. 8

Orientation: East

Description: Printing press room with portable Bin for Solvent- and Ink-contaminated Rags

Location: SWMU 8

Date: July 17, 1992



Photograph No. 9
 Orientation: South
 Description: Nestle's Hazardous Waste Accumulation Area

Location: SWMU 7
 Date: July 17, 1992



Photograph No. 10
 Orientation: South
 Description: Nestle's Outdoor Flammable Liquid Storage Area

Location: AOC 1
 Date: July 17, 1992



Photograph No. 11

Orientation: Northwest (and down)

Description: Catch basin connected by pipe to the Outdoor Flammable Liquid Storage Area

Location: AOC 1

Date: July 17, 1992



Photograph No. 12

Orientation: Northwest

Description: Spillway and ditch connected by pipe to the catch basin, which is connected by pipe to the Outdoor Flammable Liquid Storage Area

Location: AOC 1

Date: July 17, 1992



Photograph No. 13
Orientation: West
Description: Pressco's Hazardous Waste Accumulation Area

Location: SWMU 10
Date: July 17, 1992

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

34

Victoreen, Inc

7/10/92

1:05pm-2:50pm

Line soldering machine

35

Wave solder sent off as solid brass.

Owners: GE → Johnson & Johnson → ^{Thermon} ~~Thermon~~

Another occupant (tenant):

Picker International makes

Wickstar is property management (2/14/34 - 2002)

NRE equipment assembler

Technique method

C.T. Scanners in this building.

Explosion proof building is under Victorian control.

Problem: Line crack in concrete floor for

reclaiming photo negative processing

Waste water → went to sewer

Freons are in vapor degreaser.

Two degreasers (one exhausted, one does not)

no ponds, but registration to census

Environmental audits performed before new company bought businesses in that building.

Limbs, furnace - removed 1 1/2 yrs ago

Drying carbon resistors

(RR)

Victoreen is in Sgg. CHD 982 424 970

Paint spray (cans) both into dry-f.H.H.s.

Make instruments for health & medical

field, dosimeters, such as gages counter.

Hydrogen furnace - Hydrogen oxidizing parts.

Wastes: cleaning solvents (freons) (gasol),

buttle & furnace - removed 1 1/2 yrs ago, used

Waste oil, lab picks - solvent, acids,

for make resistors.

epoxide, methanol, acetone

(36)

High voltage resistor oil bath - for testing resistors. Oil vapors go out the stack.

Fume hoods for cleaning small parts.
(acids, caustics, & solvents)

Radioactive sources and contaminated ~~equipment~~ equipment in room east of and adjacent to Explosion proof room (added wall)

Explosion proof room stores raw materials solvents and bare waste

Paint Room

Technicians had a shallow trench (concrete)

Room had dip tanks.

Room was tiled by Viltmore.

Sprayer paint used in paint booth
For lacquers, vinyls and acrylics

(37)

Will send EPA letter.

Will request environmental audits

7/16/92 3:05pm - 3:50pm

Weston

Kim Sellers

Weston owns this property. Trickett is owned by Weston. Project, mgmt development firm.

Mike Tomaro:

There was a Phase I performed.

- Society of explosive engineers.

3rd Floor - Pumper X-ray plant & dept

2nd Fl. - Huber Co. (trade journals publishing co. (mailing & writing))

1st Floor - Kelly Services

- Mike Weiss representative

- Wexler pres. office

(37) 7/1/82

Technicare (Westle)

8:10 AM
11:45 AM

John Odersch
Rick Arino
Dave Dechant

Built MRI units here

Apparently used animals to test equipment.

Westle moved in in 1987-1988.

Westle. Sheet-fed print shop.

Also packaging. Do cutting and folding.
Make plates.

Photography → mechanical stripping → plate
creation (ultraviolet) → plate to press →
print → dry the product → cut or
stitched → shipped.

(38) Next building

Pressco Technology - mfg. equipment
that makes packaged materials.

to: Frank Cullin

- Shogata - circuit boards

- Innovative Imaging

: Bill McCrowski

For built

[Send EPA letter to Westle]

40

Photography: Silver recover unit.

waste bottles go to sewer.

waste negatives go for silver recovery.

Plate creation: Scrubber ~~connected to~~ used to mechanically

remove unexposed parts. Discharge from scrubber

to sanitary sewer.

No problems from John Sanitary District.

[chemicals involved?] [LSDS?] [Ask Eric]

Printing: Print a variety of products

including poster boards, menus, stationary.

Inks → [LSDS?]

Not much total
product production

Solvents: applied by rag on plates.

Rollerwash from Varn. → Stottford solvent.

low flash.
-water mix.

Alcohol used in printing operation. Flushed

to sewer periodically.

41

Oil generation from presses in

crankcase for lubricant.

Rags go to in-town cleaning service.

No air permits. (Cleveland air

Division was in 1988 and raised no
concerns.

Unusable ink from presses is placed in

55 gal drum. Safety-Aleen sends

to Cement Kiln for secondary fuel.

100% bottle collection - OHD 986 982 643

6/27/90 signed (first notation)

< 1,000 gal.

FAOB, Doc

do not

LSDS indicate any heavy metal pigments.

42

Fed (over 100) is for raw material storage. Has a grease trap. Waste stored on a deck.

Alcohol for pabs used.

Plate processor

~~Photo developer~~ 3M Linking Developer - poured down drain when replaced every two weeks.

≤ 5% Benzyl alcohol

≤ 5% Sodium Butyl Naphthalene Sulfonate

≤ 5% Ammonium Sulfate

Acetone

Film processor: Developer, fix, and water changed every Friday to sewer.

More recovery unit changed every 3 months - taken by supplier to TACSS.

Total of 3 Silver recoveries (5 gal buckets)

No RARA constituents in chemicals, except →

43

Isopropyl alcohol

Rick Patton (inventor)
Debbie Dieglio

several covered, in press room
Rag solvent container, in press room

Technique - had degreasers, touch-up machine
- wave solder machine

Tiles floor for a long time.

Leak accumulation area (one drum)

no stains or cracks. Former location

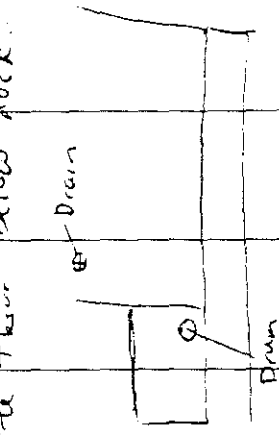
has been ~~at~~ only the cracks and dark surface - no evidence of spill.

Air conditioning system brings air in and out.

Raw material storage - covered in 1971.

Fed apparently never used by Technicare

445
 Limited concrete, no cracks, no stains
 concrete floor
 drain on
 below floor



slab drains to trap
 - mark hole over trap
 from material storage
 - dimensions unknown

← North



PVC Pipe (~6")

Red clay rim plan

Ditch
 ditch discharges
 eventually to Timbers Creek

No definitive blue prints of sewer.
 Mark hole indicated, but not accurate
 or complete

Environmental, Inc. (on letter) was contacted
 by previous general mgrs for results.

4/12/72 Pressco

Frank Calia

11:53am - 12:45pm

Pressco gutted the building. Designed
the Nov. 1980.

Technicians did not leave anything
behind.

[request history from Pressco consistent] [request floor plan in bottles]

Assemble interrogators. The number
insects containers like coke cans.
like software, but just assemble
equipment.

No degreasers. Some soldering.

Water parts washer - discharge
to sewer. Cleans circuit boards.

Used to have a paint room for
cabinets.

One drum of used solvent

DEB, FEB 83 4/16/92

OHD 927 009 396

Drum on pallet on concrete. at
low level (level floor)

No cracks in concrete

47

4/12/72



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

June 23, 1992

Mr. Mark Hoy
Nestle Print Graphic Service Division
29000 Aurora Road
Solon, Ohio 44139

Re: Visual Site Inspection
Nestle Print Graphic Service Division
(formerly Technicare Corporation)
Solon, Ohio
OHD 055 827 489

Dear Mr. Hoy:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for July 1992. (A specific date and time will be arranged with you or your representative.) The inspection team will consist of John Maher and Ron Baker of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio

Mr. Mark Hoy
June 23, 1992
Page 2

Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Nancy Zikmanis, OEPA
Harry Courtright, OEPA
Edward Kitchen, OEPA

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

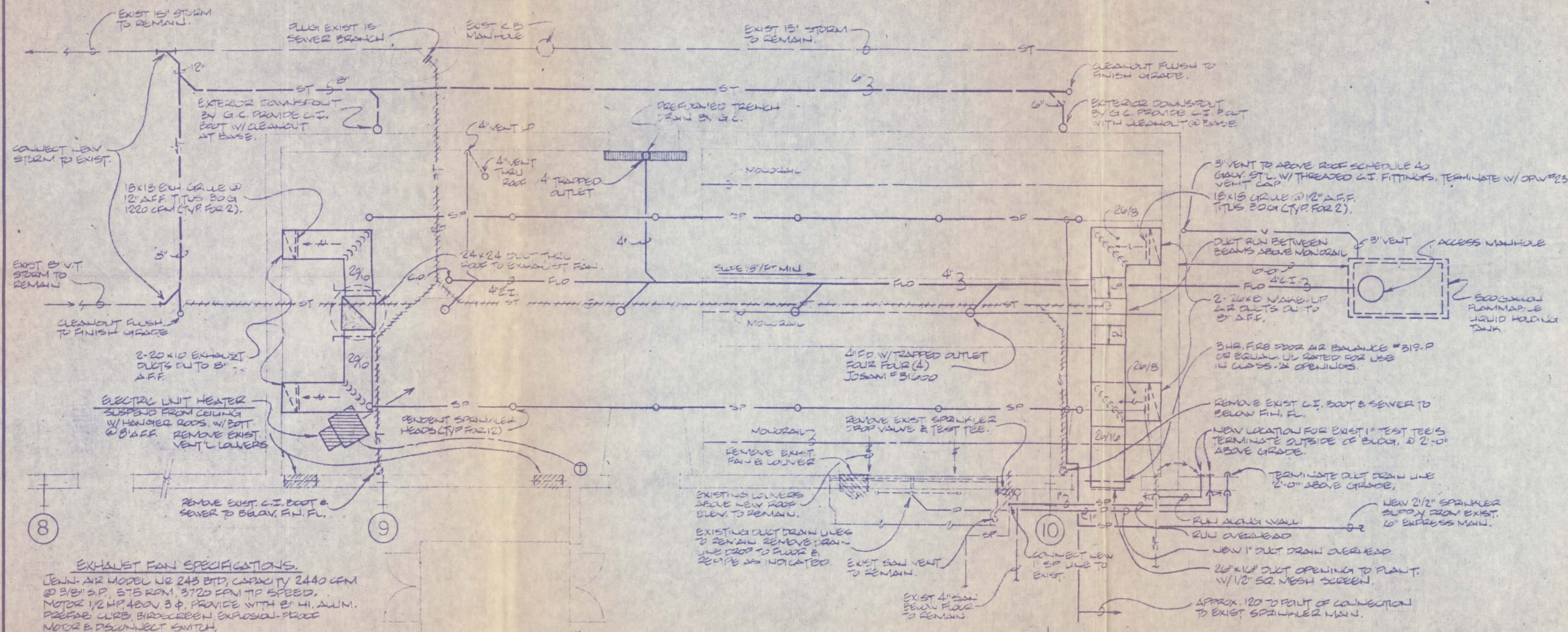
The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

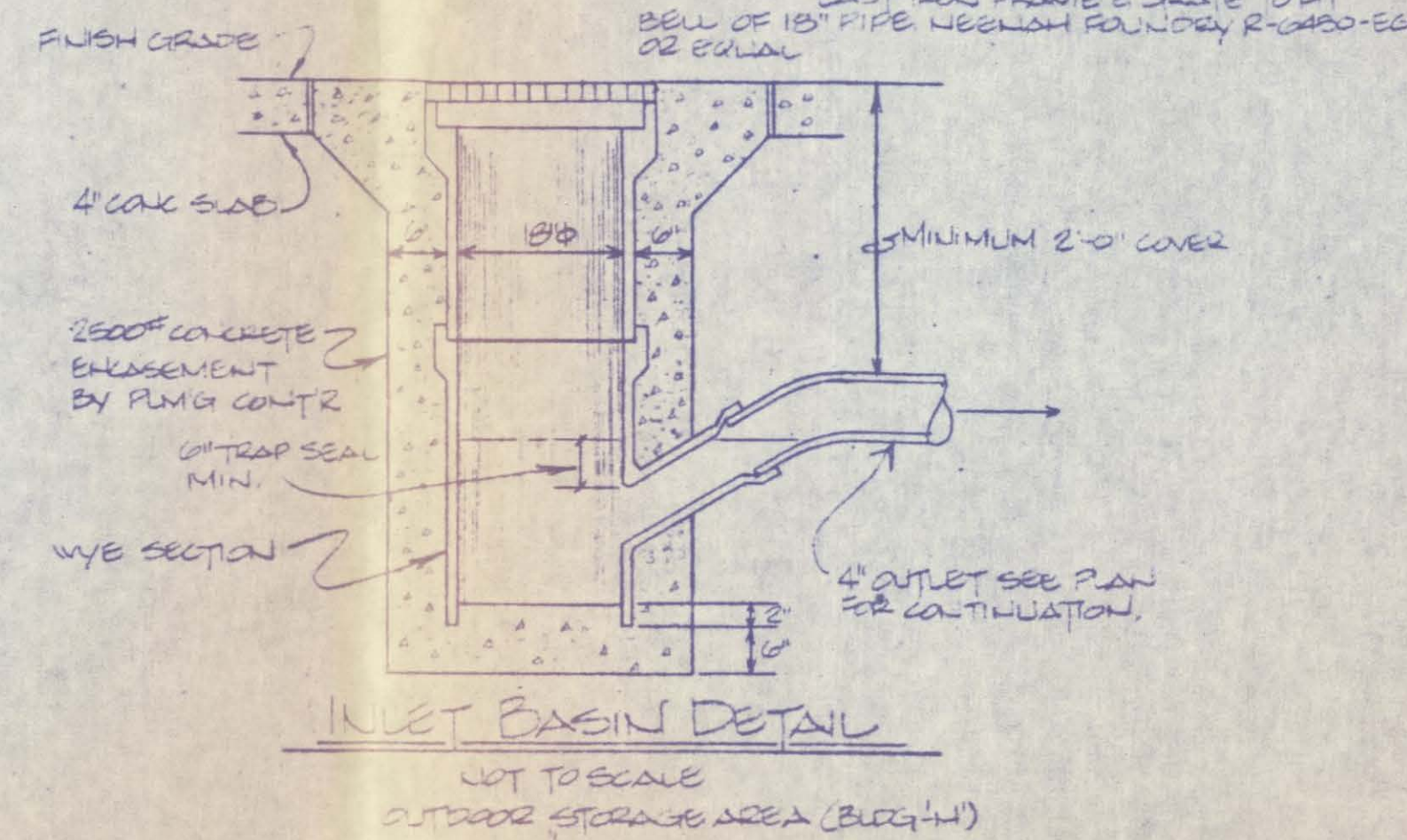
An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU



MECHANICAL LEGEND	
FLO	FLAMMABLE LIQUID DRAIN
ST	STORM SEWER
FO	FLOOR DRAIN
CO	CLEAN-OUT
CI	CAST IRON
VT	VITROL'S TILE
SP	SPRINKLER PIPING
--- EXISTING PIPING OR EQUIPMENT	
--- EXISTING PIPING OR EQUIPMENT TO BE REMOVED OR ABANDONED	
--- THERMOSTAT	
①	DUCT ELBOW WITH TURNING VANES
ΔFF	REMOVE FINISHED FLOOR



EXHAUST FAN SPECIFICATIONS

JENN AIR MODEL NO 243 BTD, CAPACITY 2440 CFM @ 3/8" S.P., 575 RPM, 3720 CFM TP SPEED. MOTOR 1/2 HP 480V 3 φ, PROVIDE WITH 2" H. ALUM. PRESSURE CLIP, BIRDSCREEN EXPLOSION-PROOF MOTOR & DISCONNECT SWITCH.

ELECTRIC UNIT HEATER

CHROMALOX MODEL # CUH-1502-EP 150V, 480V, 3 φ, TSTAT. MODEL # VR-800F UNIT AND TSTAT SHALL BE EXPLOSION PROOF SUITABLE FOR USE IN CLASS I, GROUP DIVISION I LOCATIONS. PROVIDE MODEL # CEP-4HUB-EP 30 AMP, 3 POLE CONTACTOR FOR INSTALLATION OUTSIDE OF SPACE. PIPING & CONTROLS WIRING SHALL BE BY ELECTRICAL CONTRACTOR. UNIT HEATER SHALL BE SUITABLE FOR CEILING MOUNTING.

SPRINKLER SYSTEM NOTES

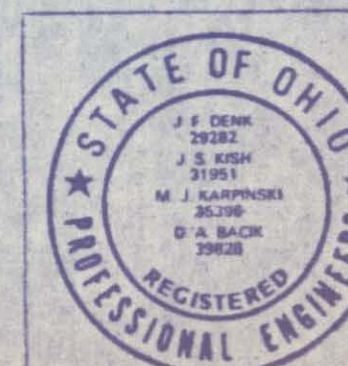
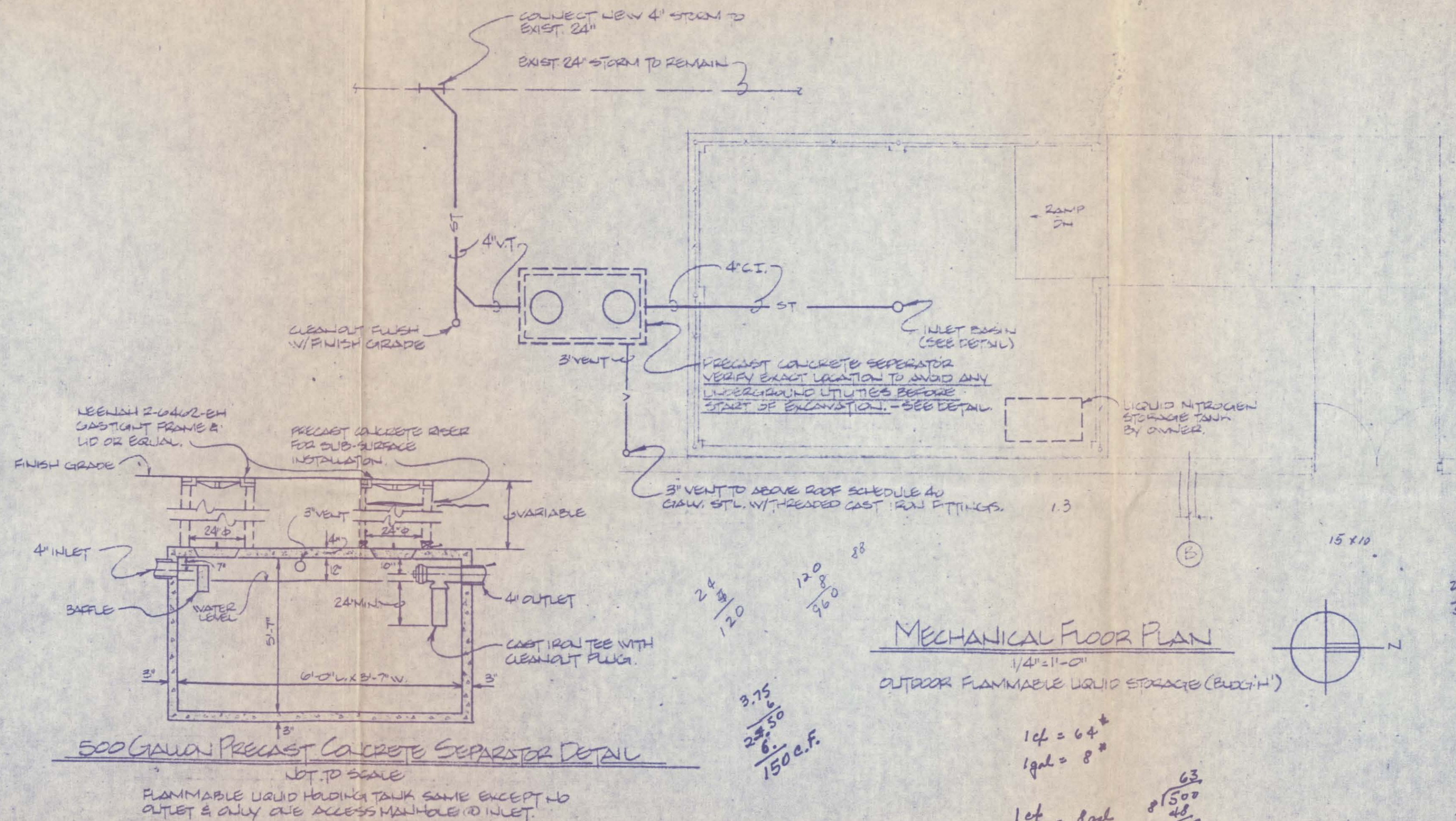
1. Sprinkler head layout shall be for extra hazard occupancy.
2. Contractor shall design and install sprinkler system per NFPA, Industrial Risk Insurers, local and state requirements.
3. Contractor shall submit drawings and hydraulic calculations of new layout to Insurance Underwriter (Industrial Risk Insurers) for approval prior to installation.
4. Contractor shall coordinate system installation with other trades.
5. The Contractor shall hydraulically calculate the sprinkler system pipe sizes the system shall be capable of providing a density of .35 gpm/sq. ft. with all heads operating.

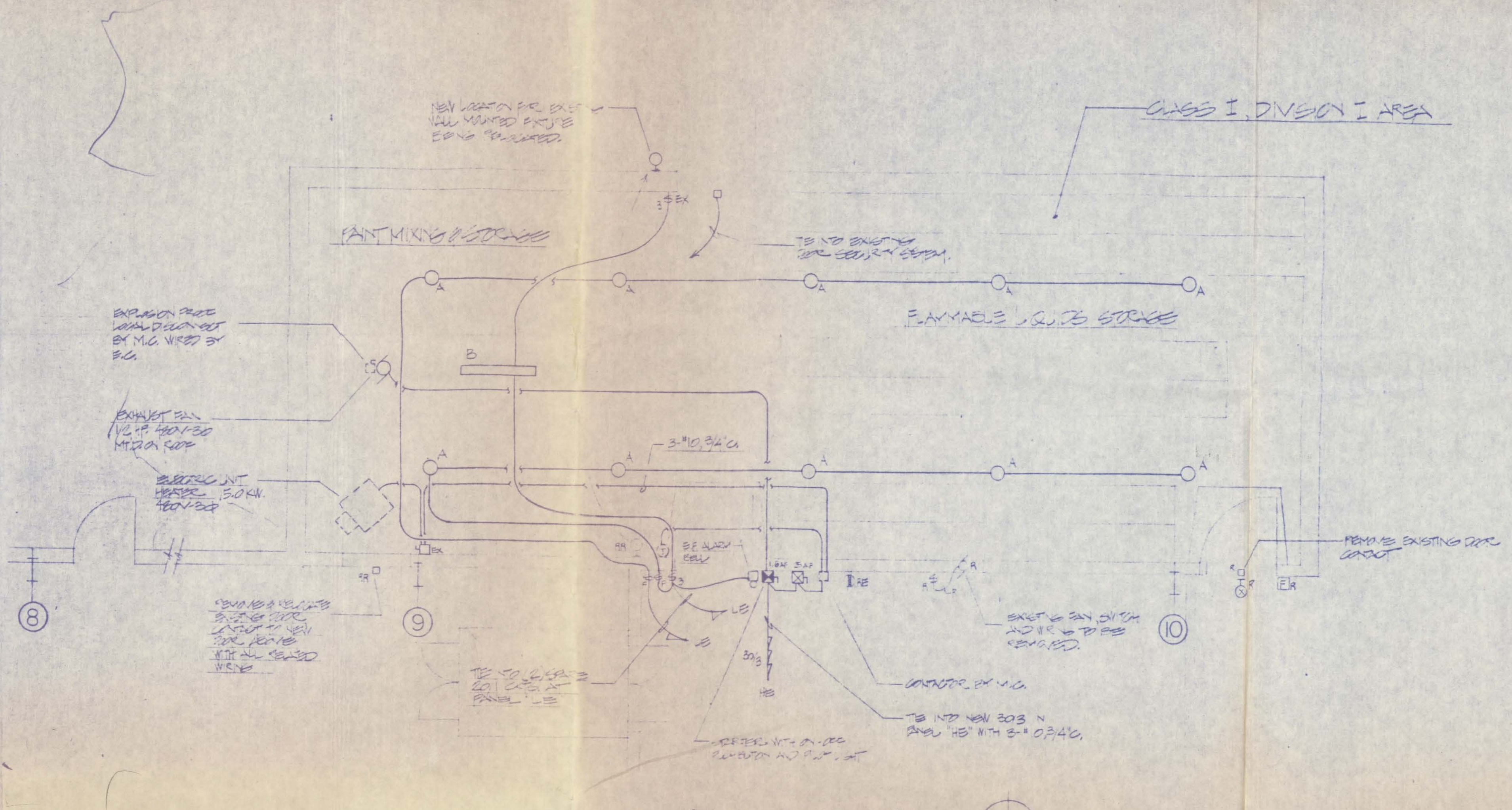
HVAC SPECIFICATIONS

1. General Conditions and other contract documents apply to this portion of work.
2. Furnish all labor, materials, transportation, etc. to provide a complete and operable heating, ventilating and air conditioning system.
3. All ductwork to conform to ASHRAE guide and SMACNA standards.
4. Comply with state and local codes and regulations. Obtain all licenses and pay all fees as required.
5. Do all cutting and patching necessary for the installation of this work.
6. All equipment is to be installed in a neat and workmanlike manner, according to manufacturers recommendations and good practices. Coordinate all work with other trades.
7. Furnish all controls, wiring diagrams and motors. Contractors and disconnects shall be furnished by the Electrical Contractor unless furnished as an integral part of the equipment.
8. System is to be balanced to comfort conditions and three maintenance manuals turned over to Owner before final acceptance. All systems and equipment are to be guaranteed for parts and labor for one year.

PLUMBING SPECIFICATIONS

1. General Conditions and other contract documents apply to this portion of the work.
2. Furnish all labor, materials, transportation, etc., to provide a complete and operable plumbing system.
3. Comply with all state and local codes and regulations. Obtain all licenses and pay all fees as required.
4. Do all cutting and patching necessary for the installation of this work.
5. Piping and equipment are to be installed in a neat and workmanlike manner according to manufacturers recommendations and good practices. Coordinate all work with other trades.
6. System is to be guaranteed for parts and labor for one year from date of acceptance.
7. Do all excavation, shoring, pumping and backfill necessary for the installation of tanks, piping and separator. Repave or resed as necessary.

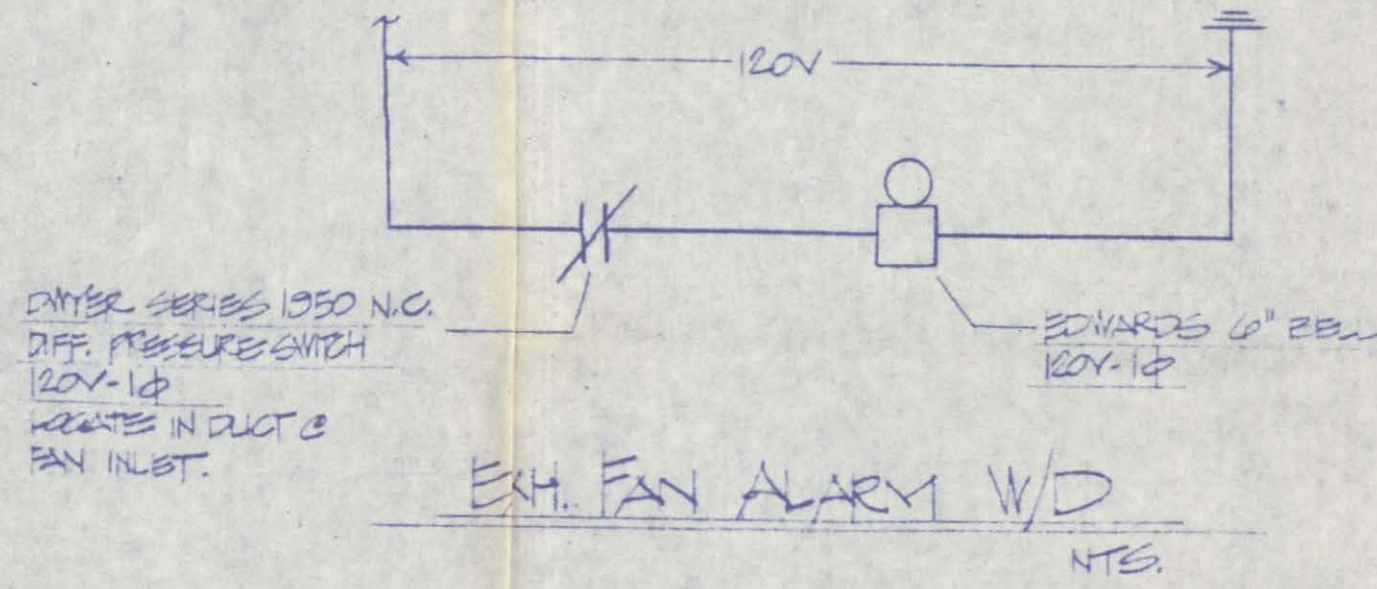




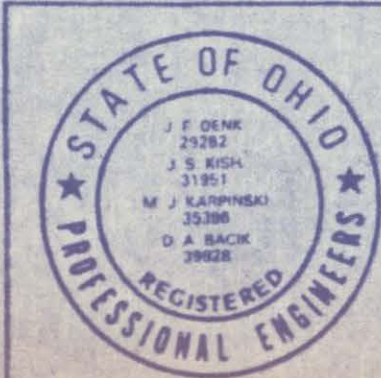
- LEGEND**
- ⊕ SWITCH - SINGLE POLE
 - ⊕_{EX} SWITCH - EXPLOSION PROOF
 - ⊕_P SWITCH WITH PULL LIGHT
 - ⊕₃ SWITCH - THREE WAY
 - ⊕₄ SWITCH - FOUR WAY
 - ⊕₅ SWITCH - FIVE WAY
 - ⊕₆ SWITCH - SIX WAY
 - ⊕₇ SWITCH - SEVEN WAY
 - ⊕₈ SWITCH - EIGHT WAY
 - ⊕₉ SWITCH - NINE WAY
 - ⊕₁₀ SWITCH - TEN WAY
 - ⊕₁₁ SWITCH - ELEVEN WAY
 - ⊕₁₂ SWITCH - TWELVE WAY
 - ⊕₁₃ SWITCH - THIRTEEN WAY
 - ⊕₁₄ SWITCH - FOURTEEN WAY
 - ⊕₁₅ SWITCH - FIFTEEN WAY
 - ⊕₁₆ SWITCH - SIXTEEN WAY
 - ⊕₁₇ SWITCH - SEVENTEEN WAY
 - ⊕₁₈ SWITCH - EIGHTEEN WAY
 - ⊕₁₉ SWITCH - NINETEEN WAY
 - ⊕₂₀ SWITCH - TWENTY WAY
 - ⊕₂₁ SWITCH - TWENTY-ONE WAY
 - ⊕₂₂ SWITCH - TWENTY-TWO WAY
 - ⊕₂₃ SWITCH - TWENTY-THREE WAY
 - ⊕₂₄ SWITCH - TWENTY-FOUR WAY
 - ⊕₂₅ SWITCH - TWENTY-FIVE WAY
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 - ⊕₂₇ SWITCH - TWENTY-SEVEN WAY
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 - ⊕₉₈ SWITCH - NINETY-EIGHT WAY
 - ⊕₉₉ SWITCH - NINETY-NINE WAY
 - ⊕₁₀₀ SWITCH - ONE HUNDRED WAY

SPECIFICATIONS

- 1) Drawings show minimum design requirements. In addition, all National and local codes shall be followed.
- 2) Electrical, mechanical, architectural, structural and all other plans as well as the specifications are a part of the contract documents.
- 3) The final locations of all equipment, outlets, etc. are subject to reasonable changes by the Architect or Owner before roughing-in at no additional cost.
- 4) All motors, etc., in connection with heating, ventilating and cooling equipment are provided by another section but required disconnects, starters and installation are by this Contractor.
- 5) Temperature controls are provided by another section but Electrical Contractor provides all conduit, wire and shall make all connections. HVAC to supply schematic.
- 6) The Contractor shall visit the site before bidding to satisfy himself that no interferences exist. Coordinate work with all other trades during construction.
- 7) This Contractor to secure and pay for permits and inspections required for electrical work.
- 8) Provide approved nameplates on all panelboards, distribution equipment, starters, junction boxes, pullboxes, switches and control devices. Provide typewritten directory cards for branch circuit identification.
- 9) Test for grounds and shorts.
- 10) Provide all cutting and patching required for installation of electrical work.
- 11) Temporary service wiring and lighting provided by Electrical Contractor to OSHA requirements.
- 12) Provide submittal drawings for all fixtures, distribution equipment and starters for approval by the Architect and Engineer.
- 13) All equipment shall be new and U.L. approved.
- 14) Conduit shall be galvanized rigid steel.
- 15) Run all conduit concealed in finished areas.
- 16) All lighting and power wiring for circuits less than 100 feet shall be #12 AWG unless noted. Wire types shall be TW for #10 and smaller and THW for #8 and larger. All wire sizes are given for copper wire.
- 17) Wiring devices shall be specification grade. Adjacent devices must be ganged.
- 18) Disconnect switches shall be heavy duty.
- 19) Ground all conduits, cabinets, motors, panels and other exposed non-current carrying metal parts of electrical equipment in accordance with all provisions of the National Electric Code, or local codes that may apply.
- 20) Distribution equipment, lighting fixtures, etc. shall be as specified on the drawings.
- 21) Fluorescent lamps shall be warm white. Incandescent lamps shall be 130 volt.
- 22) Guarantee for one year after acceptance by Owner, all workmanship and materials furnished.
- 23) Explosion-proof devices, equipment and wiring shall be installed and rated for Class I, Division I requirements.



LATH FIXTURE SUPPLIES				
ITEM	QUANTITY	UNIT PRICE	DESCRIPTION	CO. NO. & WEEK
A	300 3-30	300	NONWEIGHT EXP. BRUSH RICE CRATE PERCENT W.D. WEIGHT OF CRATES (3'0" x AFF. & PROBABLY SEE 3-30, 2 H.B.S. AND QUARD.	APPROX # 40203 - MAY-2 - JUNE- 2ST
B	2-40	10	FLARE, BUT 2-LAMP BRUSH RICE CRATE PERCENT W.D. WEIGHT OF CRATE (3'0" AFF. & 2000 ST. QUARD.)	APPROX # 40240-118

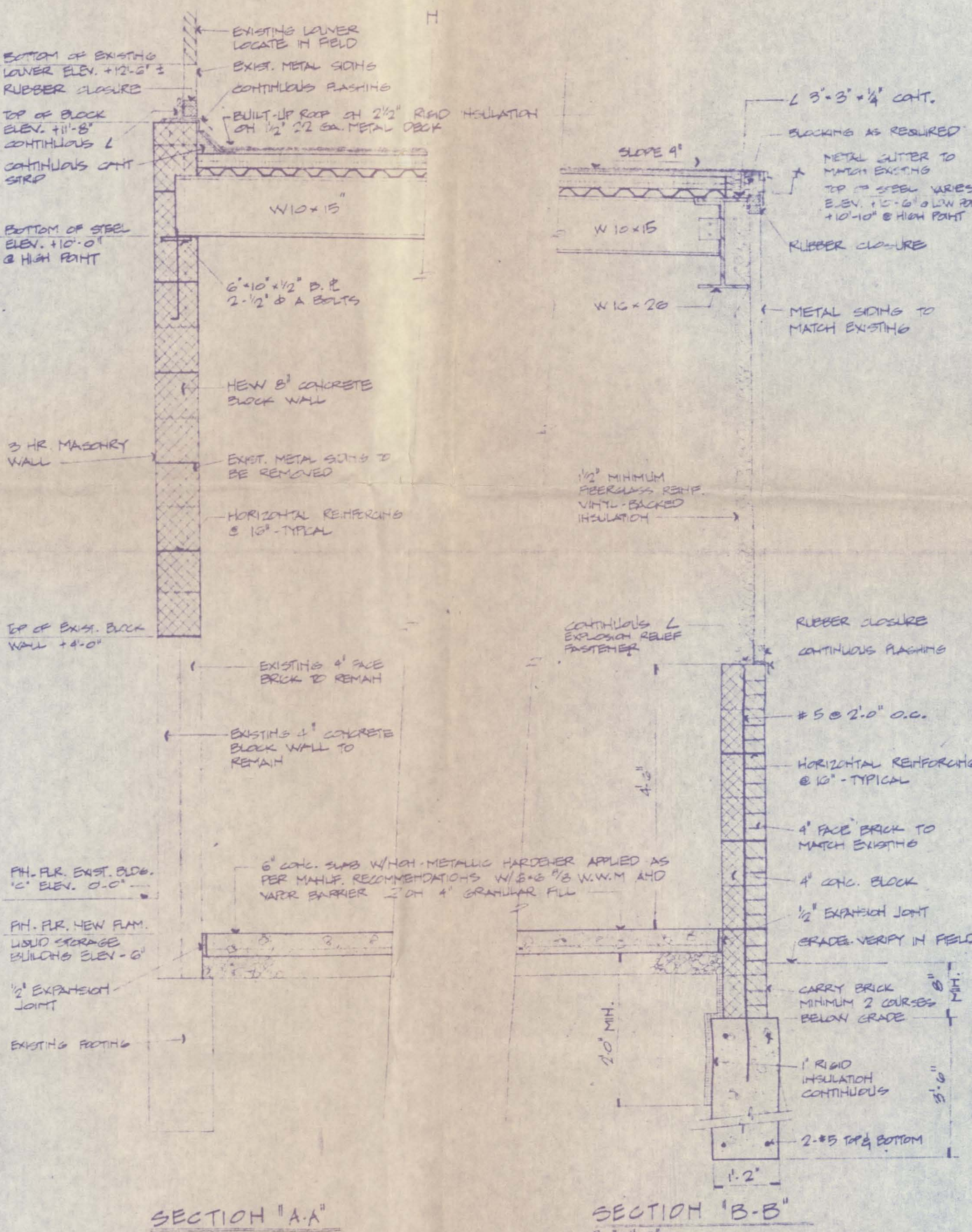
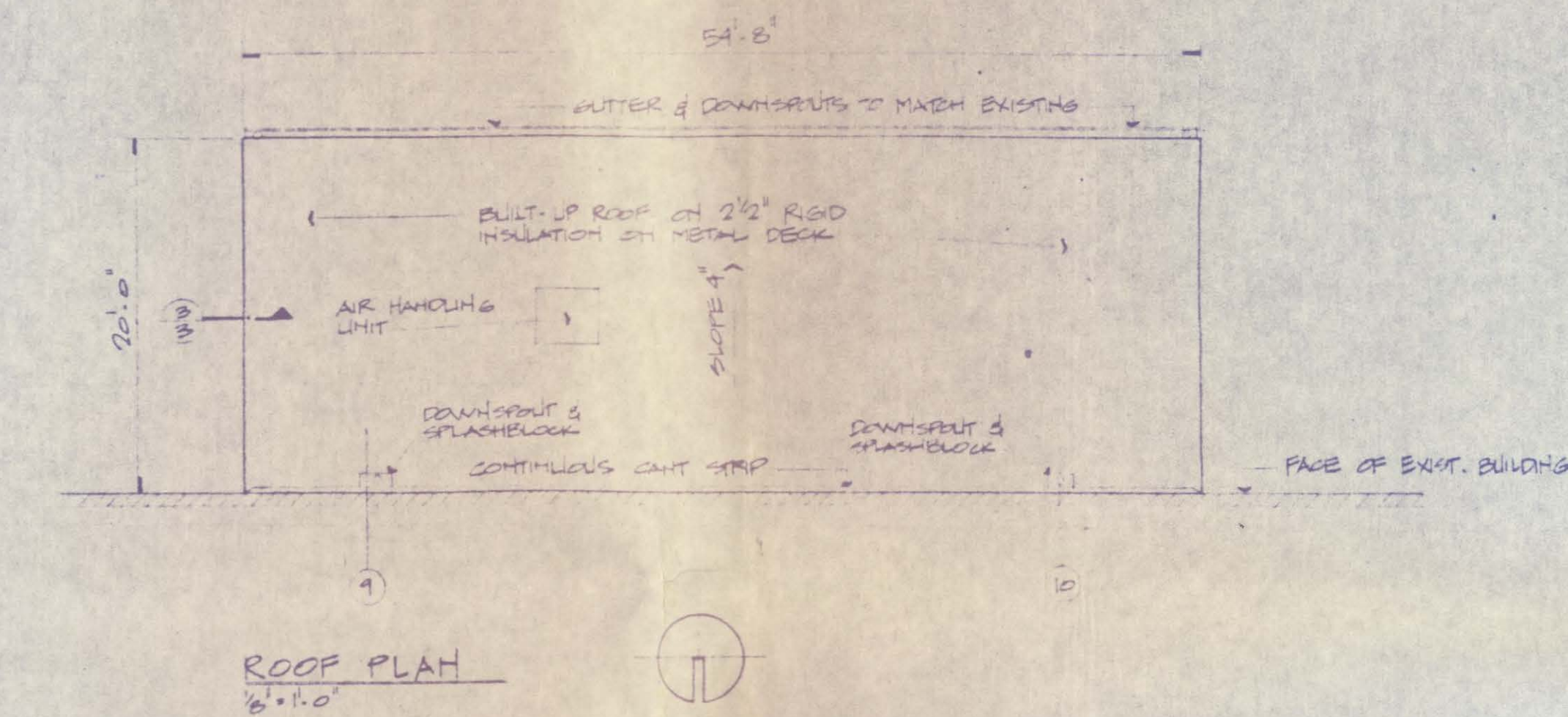
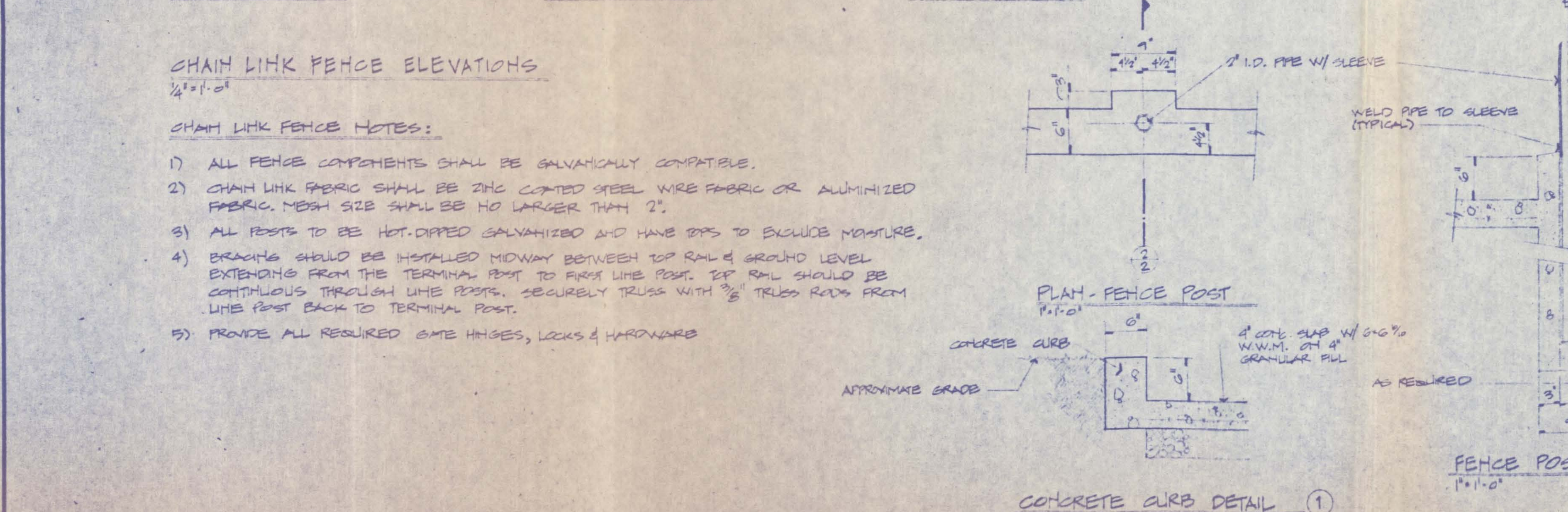
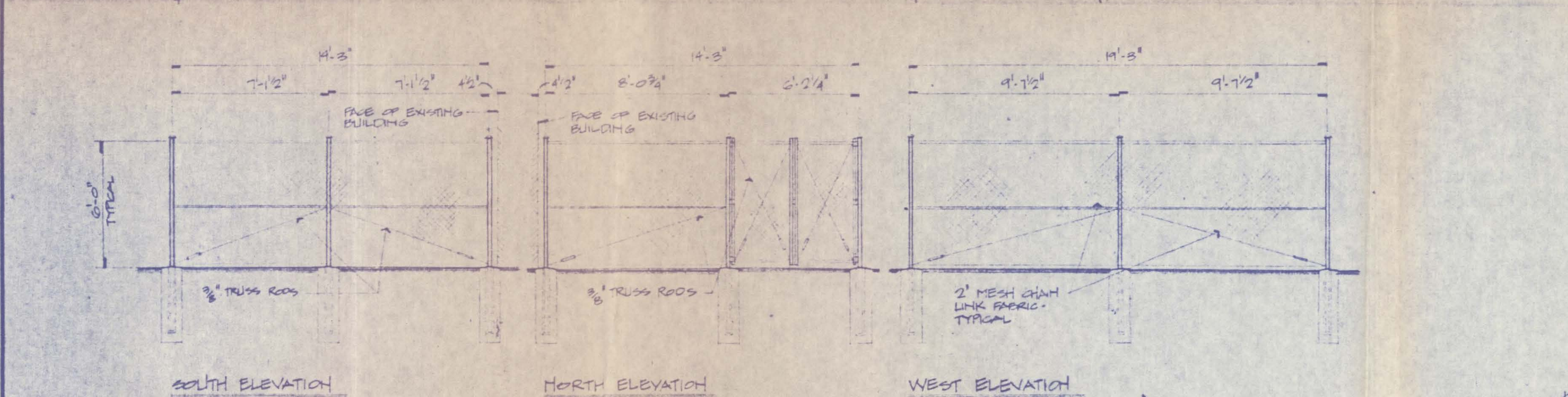
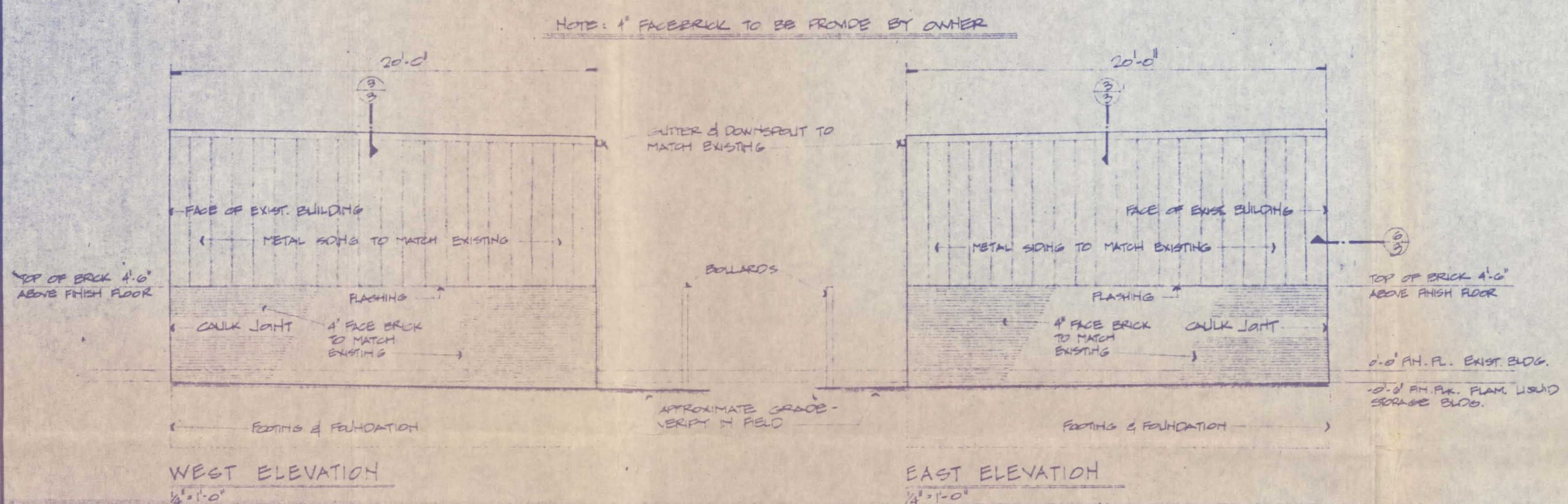
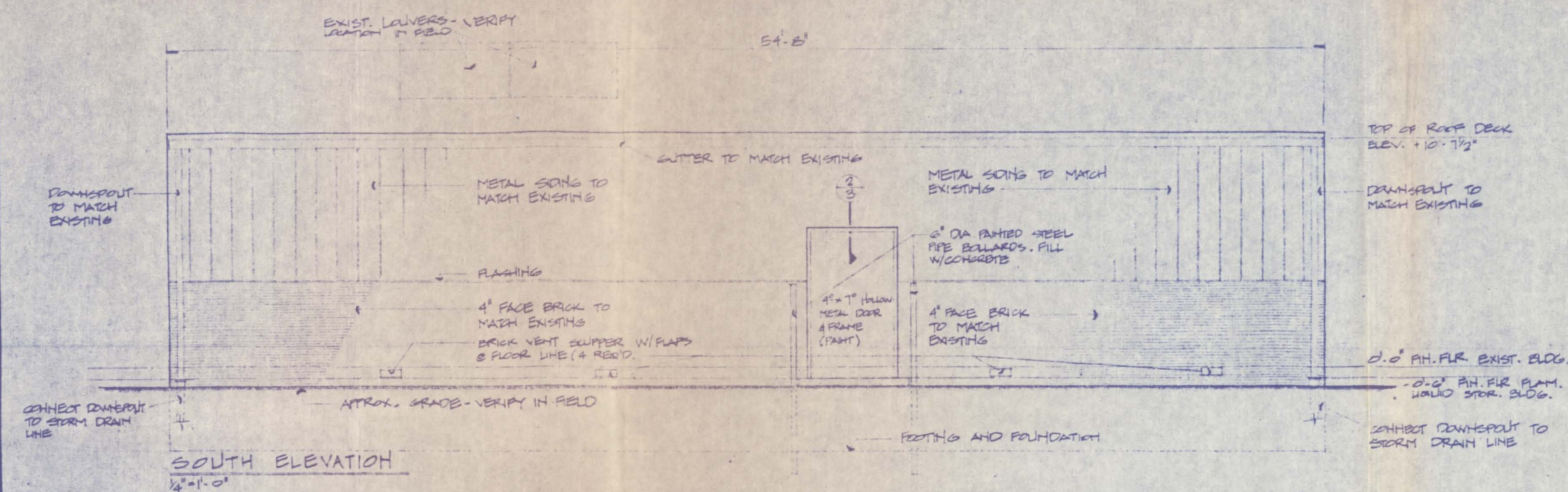


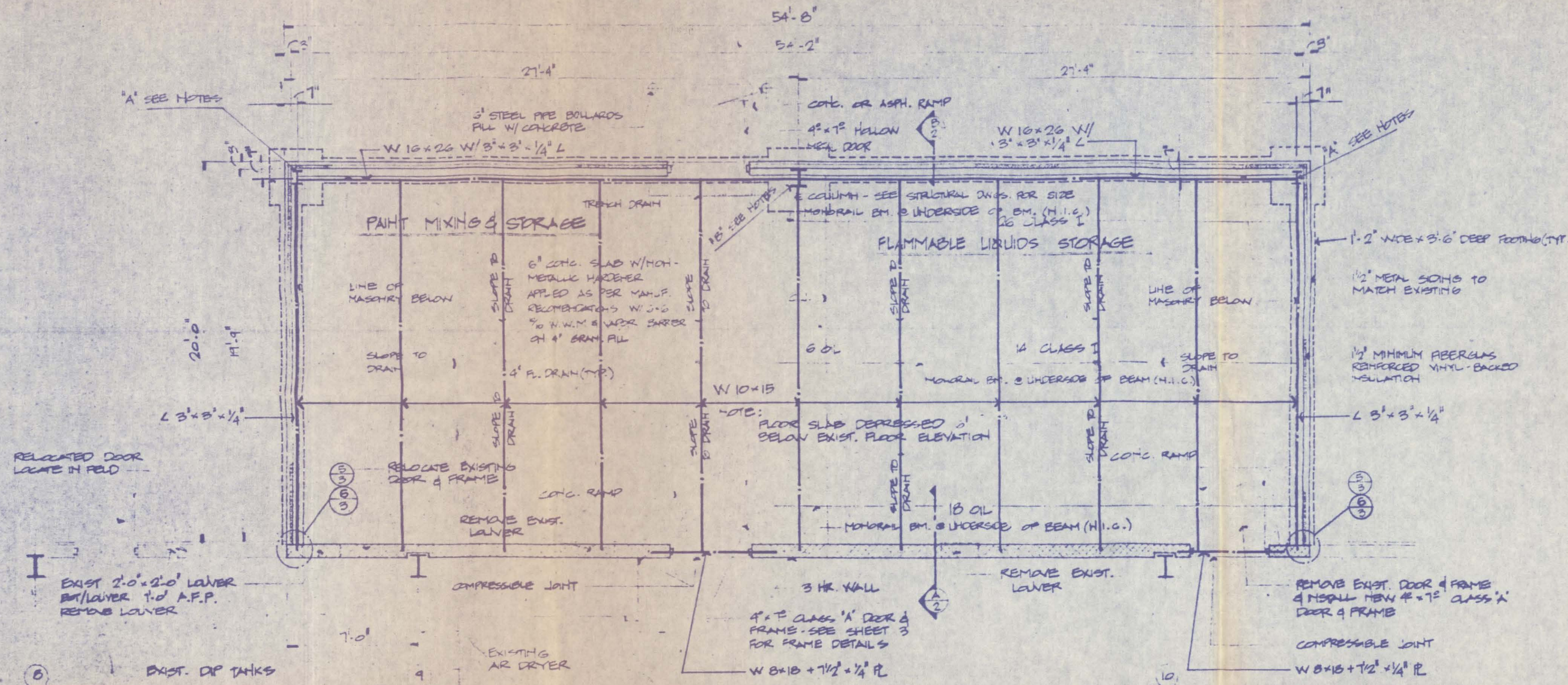
REVISIONS	B

ARCHITECTS
C. A. McGETTRICK, INC.
100 EAST 95TH STREET CLEVELAND, OHIO 44114
216-381-6800

ELEVATIONS & SECTIONS

DATE	MAR. 18, 1981
SCALE	AS NOTED
DRAWN	R. MOORE
JOB	B106
SHEET	2
OF 6 SHEETS	

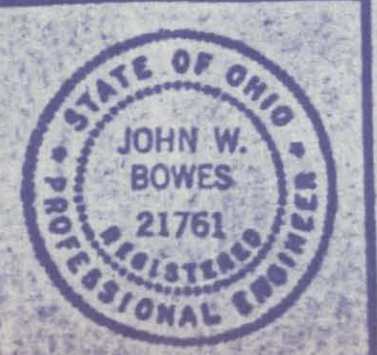


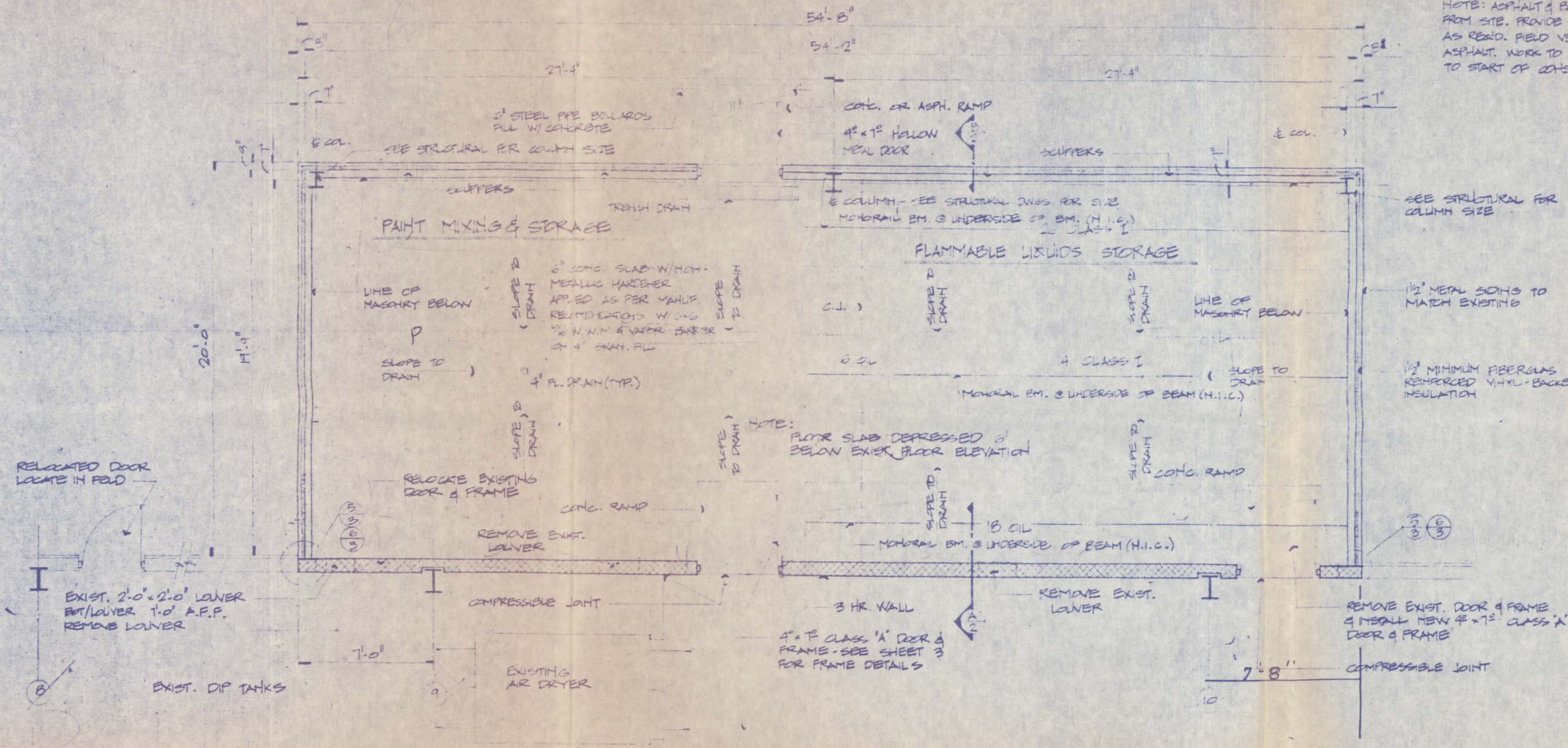


COLUMN NOTES

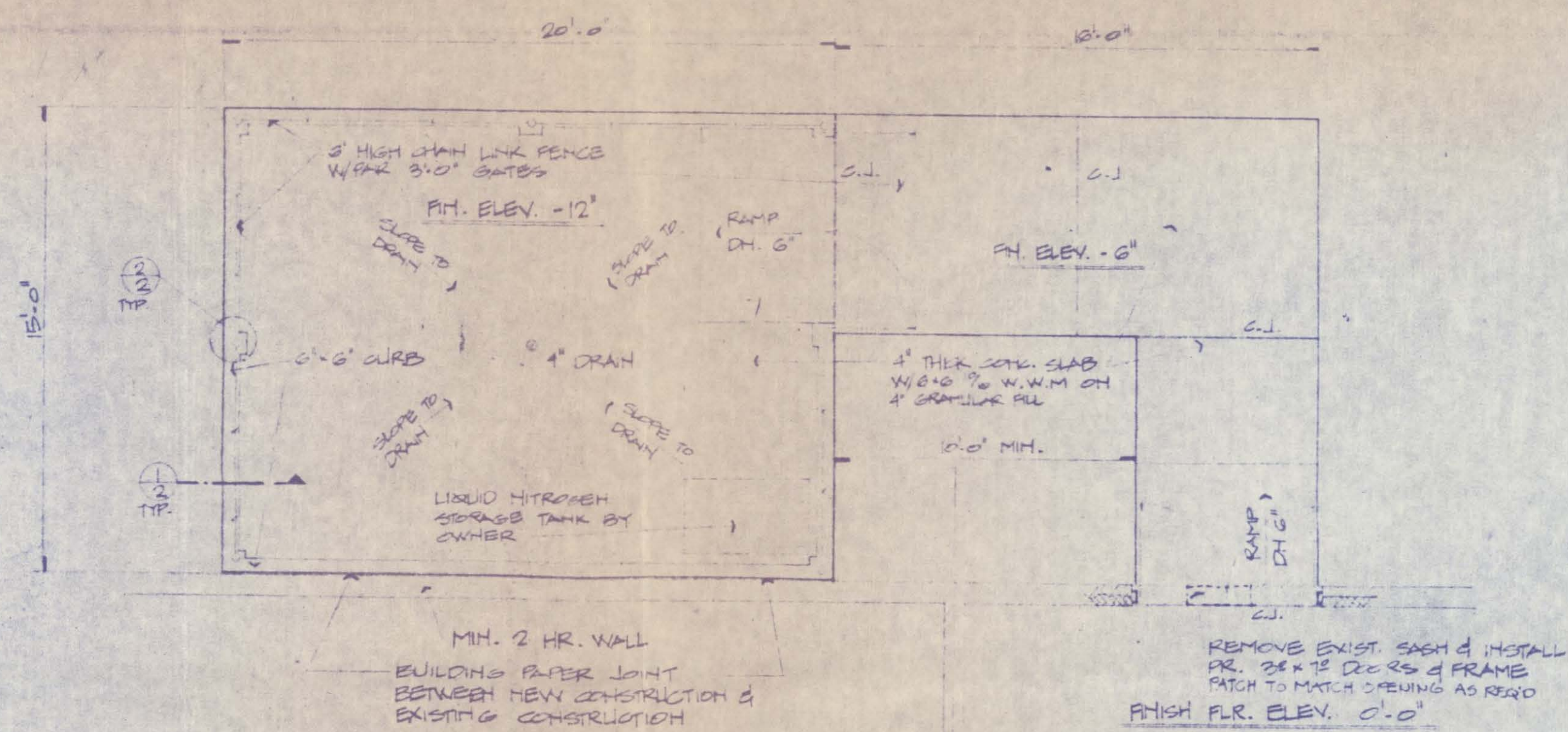
COLUMN "A":
W 8 x 24
10' x 10' x 3/4" B. P.
10' x 10' x 3/4" BED P.
2-3/4" x 4" A. BOLTS
3/4" NON-SHRINK GROUT
16' x 16' CONCRETE PER
4-#5 VERT.
4-#5 FOOTING BOWELS
#3 TIES @ 12" O.C.
2' x 10' x 2' x 10' FOOTING
3-#4 EACH WAY - BOTTOM

COLUMN "B":
W 8 x 24
10' x 10' x 3/4" B. P.
10' x 10' x 3/4" BED P.
2-3/4" x 4" A. BOLTS
3/4" NON-SHRINK GROUT
16' x 16' CONCRETE PER
4-#5 VERT.
4-#5 FOOTING BOWELS
#3 TIES @ 12" O.C.
3' x 4' x 3' x 4' FOOTING
3-#4 EACH WAY - BOTTOM





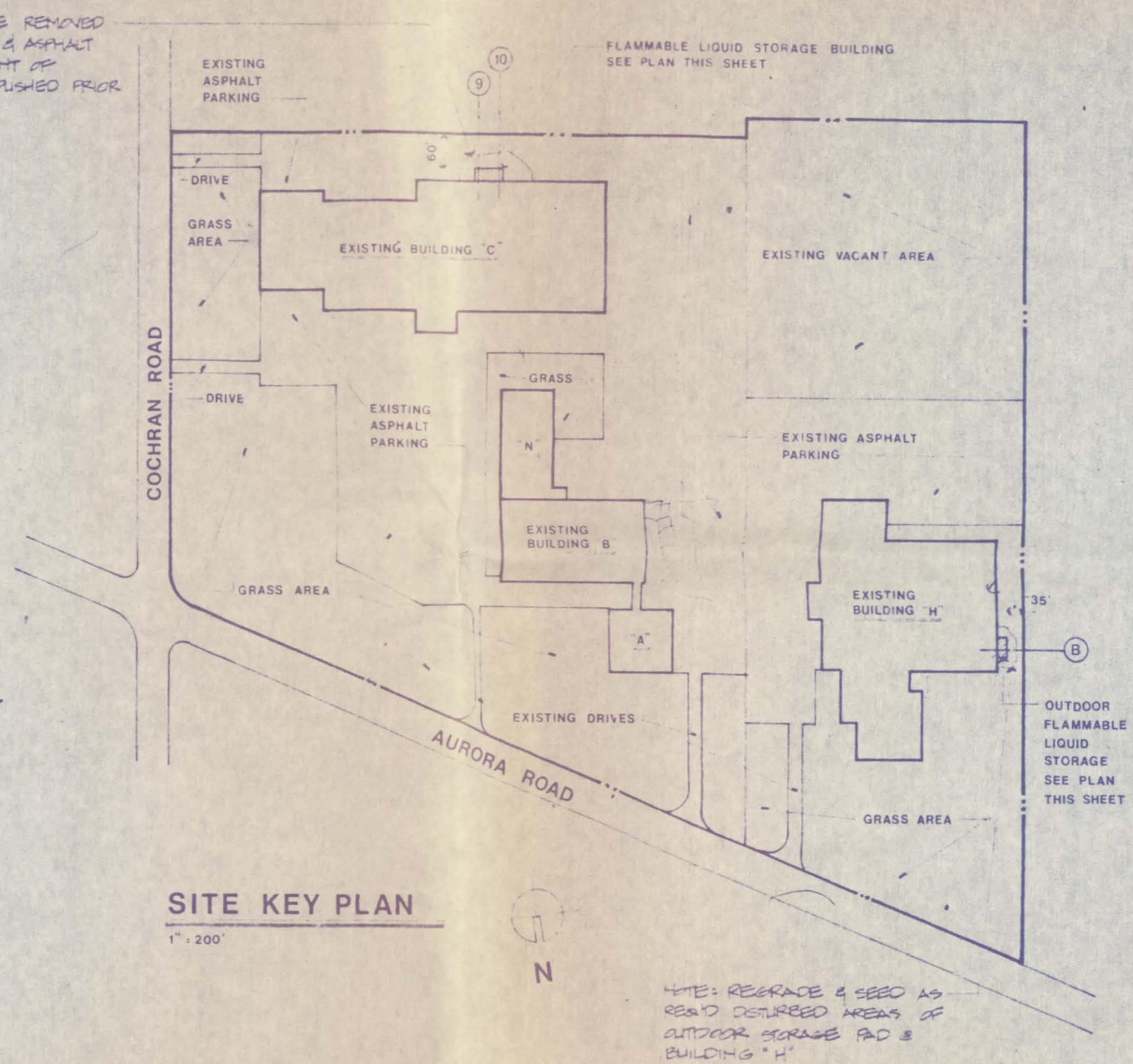
FLOOR PLAN - FLAMMABLE LIQUID STORAGE BUILDING (BLDG. C)
1/4" = 1'-0"



PLAN - OUTDOOR FLAMMABLE LIQUID STORAGE (BLDG. H)
1/4" = 1'-0"

SEE SHEET 2 FOR DETAILS OF
FENCE & SLAB

NOTE: ASPHALT & BASE TO BE REMOVED
FROM SITE. PROVIDE NEW BASE & ASPHALT
AS REQ'D. FIELD VERIFY EXTENT OF
ASPHALT. WORK TO BE ACCOMPLISHED PRIOR
TO START OF CONSTRUCTION



SITE KEY PLAN
1" = 200'

FLAMMABLE LIQUID STORAGE FACILITIES FOR:

TECHNICARE
29100 AURORA ROAD
OLON, OHIO 44139

DRAWING INDEX

- 1 SITE PLAN / FLOOR PLANS
- 2 ELEVATIONS & SECTIONS
- 3 MISCELLANEOUS DETAILS & GENERAL NOTES
- 4 STRUCTURAL FRAMING & DETAILS
- M-1 MECHANICAL PLAN
- E-1 ELECTRICAL PLAN

REVISIONS	BY

ARCHITECTS
C.A. McGETTRICK, INC.
1791 EAST 38TH STREET
CLEVELAND, OHIO 44114
216-391-4600

SITE PLAN / FLOOR PLANS
FLAMMABLE LIQUID STORAGE FACILITIES FOR:
TECHNICARE CORPORATION
29100 AURORA ROAD
OLON, OHIO 44139

DATE	MAR. 16, 1981
SCALE	AS NOTED
DRAWN	R. MOORE
JOB	8106
SHEET	1
OF 6 SHEETS	

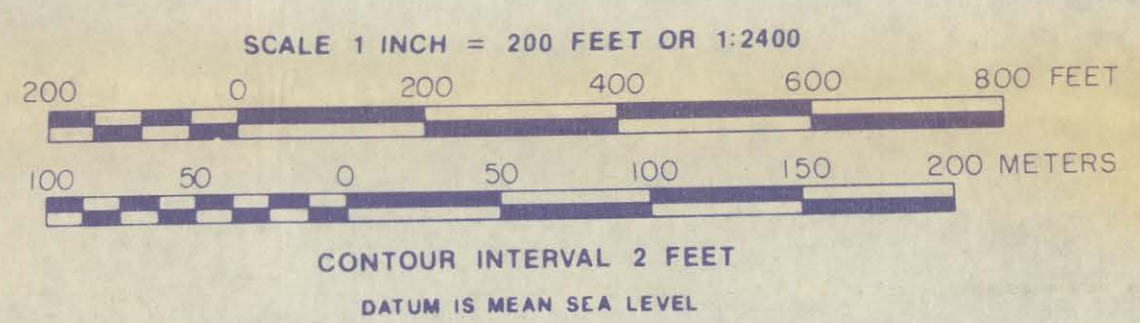




TOPOGRAPHIC MAP

PREPARED FOR
SANITARY ENGINEERING DEPARTMENT
COPYRIGHT 1978 COUNTY OF CUYAHOGA
CLEVELAND, OHIO

HORIZONTAL CONTROL POINT
VERTICAL CONTROL POINT
HORIZONTAL & VERTICAL CONTROL POINT



PRIMARY TRAVERSE: CLEVELAND REGIONAL GEODETIC SURVEY
PRECISE LEVELS: CLEVELAND REGIONAL GEODETIC SURVEY
ORTHOPHOTO MAP AND TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC
METHODS
DATE OF PHOTOGRAPHY: APRIL 1978
DATE OF MAPPING: DEC. 1978
CHICAGO AERIAL SURVEY, DES PLAINES, ILLINOIS

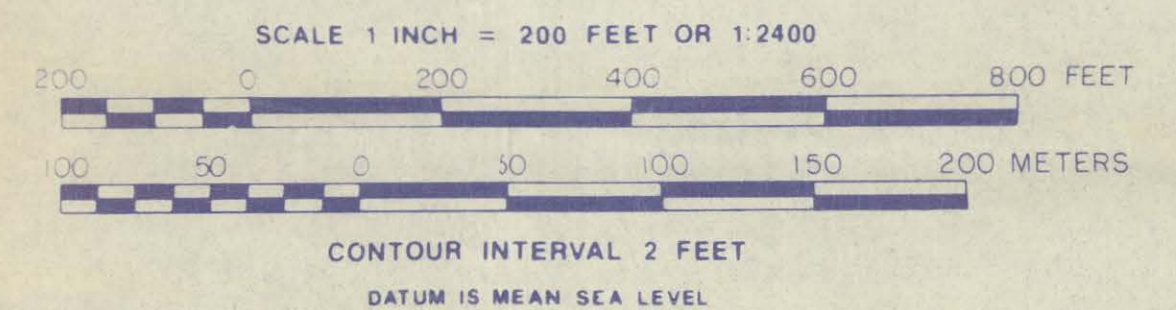
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TOPOGRAPHIC MAP

PREPARED FOR
SANITARY ENGINEERING DEPARTMENT

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CLEVELAND, OHIO



PRIMARY TRAVERSE: CLEVELAND REGIONAL GEODETIC SURVEY
PRECISE LEVELS: CLEVELAND REGIONAL GEODETIC SURVEY
ORTHOPHOTO MAP AND TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC
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